

**CITY OF BUFFALO
NEW YORK**

2020-2024 CONSOLIDATED PLAN

**2020 ANNUAL ACTION
PLAN**

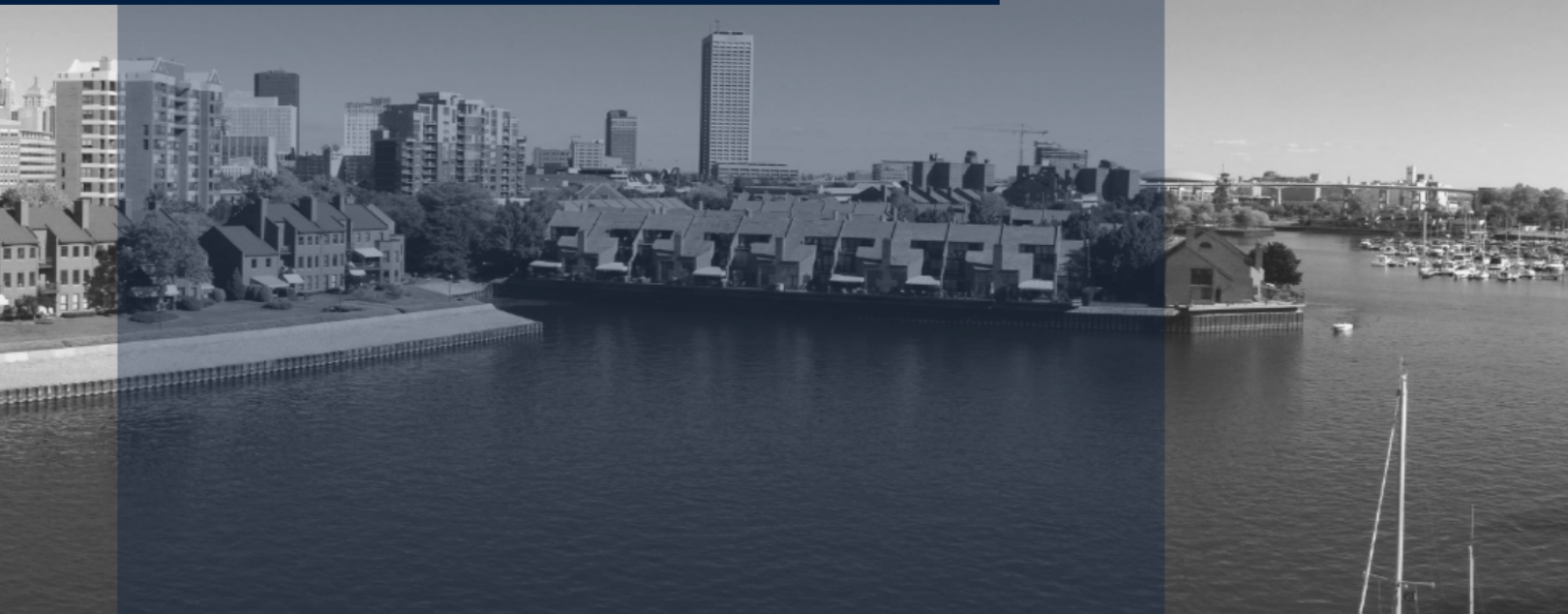




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EXECUTIVE SUMMARY

ES-05 EXECUTIVE SUMMARY - 24 CFR 91.200(C), 91.220(B)

1. Introduction

Each year, the City of Buffalo receives funds from the Department of Housing and Urban Development (HUD) for housing and community development activities to address priority needs locally identified by the City. To receive these federal funds, the City must submit a strategic plan — the Consolidated Plan — every five years that identifies local needs and how these needs will be addressed. The current Consolidated Plan is for October 1, 2020 through September 30, 2025. During the preparation of the Consolidated Plan the world was impacted by the COVID-19 pandemic. While many of the needs outlined in this Consolidated Plan are still true today, many are exacerbated by the social, economic, and health crisis facing the world.

The COVID-19 pandemic and subsequent shut down of the economy have created the need for significant intervention to get and keep low to moderate income households stably housed and healthy during the recovery phase of the pandemic. Buffalo's low-income renters are significantly rent burdened with many families living on the edge of homelessness. Suddenly job loss, COVID infections and quarantine, reduced hours and the inability to work due to schools being closed, has moved those already on the edge closer to falling off.

The City of Buffalo committed funding over the next five years to close the racial wealth gap and foster a community of fairness, equity, and justice. This approach will align economic development, housing and public services to address the needs of Buffalo residents.

Purpose of the Plan

The purpose of the Consolidated Plan (CP) is to guide funding decisions over the next five years for specific federal funds. The CP is guided by three overarching goals that are applied according to a community's needs. The goals are:

- To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing.
- To provide a suitable living environment through safer, more livable and accessible neighborhoods, greater integration of low- and moderate-income residents throughout the City, increased housing opportunities, and reinvestment in aging neighborhoods.
- To expand economic opportunities through job creation, homeownership opportunities, façade improvement, development activities that promote long-term community viability and the empowerment of low- and moderate-income persons to achieve self-sufficiency.

The four primary federal funding resources in the 2021-2025 Consolidated Plan are the following:

- Community Development Block Grant (CDBG): The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income levels. Funds can be used for a wide array of activities, including housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of

architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

- HOME Investment Partnerships Program (HOME): The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low- and moderate-income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.
- Emergency Solutions Grant (ESG): The ESG program provides federal funds to address the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. There are five program components eligible under ESG: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities.
- Housing Opportunities for Persons with AIDS (HOPWA): The Housing Opportunities for Persons with AIDS (HOPWA) Program is the only Federal program dedicated to the housing needs of people living with HIV/AIDS.

Focus of the Plan

As required by HUD, the identification of needs and the adoption of strategies to address those needs must focus primarily on low- and moderate-income individuals and households. The CP must also address the needs of persons with special needs such as the elderly, persons with disabilities, large families, single parents, homeless individuals and families, and public housing residents.

Structure of the Plan

The Consolidated Plan consists of four sections: a process description for conducting outreach and receiving comments; a housing and community development needs assessment; a housing market analysis and strategic plan that identifies priority housing needs; and the community development needs and strategies that the City plans to address with the available HUD resources over the next five years. This plan was formulated using HUD's eConPlan tool, which dictates the plan's structure and provides a series of pre-populated tables. Where necessary, the City updated or supplemented the HUD-provided tables with more accurate or relevant data.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

Based on stakeholder feedback and city precedents, including the City's goal to close the racial wealth gap and foster a community of fairness, equity, and justice, the following priorities were identified for the City of Buffalo:

Increase Supply of Affordable Housing to ensure 40% of the housing stock will be affordable

- Increase affordable rental housing for low and moderate-income residents, special needs populations and persons experiencing homelessness.
- Increase homeownership.
- Housing rehabilitation of the City's aging and deteriorating housing stock, including weatherization, energy efficiency improvements, lead-based paint hazard control, and accessibility improvements.

Economic and Workforce Development

- Provide micro-enterprise development; loans, training

- Special economic development, provide assistance to for-profit businesses

Improve Public Facilities and Infrastructure

- Improve public infrastructure including streets and sidewalks.
- Improve public facilities such as community centers, parks and recreational facilities.
- Improve commercial corridors such as façade improvements.
- Demolition of vacant and dilapidated structures.

Provide Public Services

- Provide public services that align with social determinates of health, to low and moderate-income households as well as person with special needs
- Provide public services that focus on economic development and self-sufficiency to reduce poverty.
- Improve transportation links between jobs and workers, especially low and moderate-income residents.
- Provide public facilities and supports to Buffalo residents impacted by the COVID-19 pandemic.

Planning and Administration and Fair Housing

- Provide quality oversight and administration of federal programs.
- Affirmatively Further Fair Housing

3. Evaluation of past performance

As reported in the most recent Consolidated Annual Performance Report (CAPER) Program Year 44 (October 1, 2018-September 30, 2019) the City of Buffalo has completed the following activities and made progress toward their Consolidated Plan.

During 2018 the City used funds for the demolition of 38 residential properties and four large commercial properties. Additional funds from prior years were also utilized with two additional demolitions completed.

The City of Buffalo assisted 214 units through the rehabilitation or creation or acquisition of units through the HOME Investment Partnerships Program (HOME) and the Community Development Block Grant (CDBG) funding. Of the 214 units, 24 households were tenant occupied units in owner occupied dwellings (doubles). There were also an additional 15 vacant rental units (in owner occupied doubles) where the owner occupant was eligible for and received assistance. When including the 15 vacant units, there was a total of 207 units assisted during the program year.

Emergency Assistance was provided for repairs to 98 owner occupied structures, 24 rental units, and 15 vacant rental 15 units representing a total of 137 units. Eligible repair categories include replacement of a leaky roof system, broken water line or sewer line, non-functioning furnace or hot water tank, and hazardous electrical panel or chimney. In rare cases, the program will support the replacement of a gas line.

CDBG funded Down Payment and Closing Cost Homebuyer Assistance was provided to five low-income first-time homebuyers. The City provide deferred loans to eligible households who agreed to purchase and occupy homes in the City of Buffalo. The funding assistance is for up to

\$5,000 for eligible down payment and closing costs assistance and the period of affordability is 5 years.

CDBG funded Weatherization Assistance was provided to 25 households. This program reduces energy costs for low-income households by increasing the energy efficiency of homes, while ensuring health and safety. The program provides repairs and improvements to home heating systems and provides for the installation of energy-saving measures in the house, such as insulation and air sealing. The goal of the program is to increase the energy efficiency of Buffalo's aging housing stock while reducing homeowner's residential energy expenses. The City of Buffalo successfully completed thirty-two (32) HOME assisted units that supported the creation of two hundred twenty-eight (228) affordable housing units at the following locations. • 368 Broadway Street Buffalo, New York 14204 Four (4) HOME Assisted Units • 993 Kensington Avenue Buffalo, New York 14215 Three Units • 91 Lisbon Avenue Buffalo, New York 14214 Eight Units • 429 Plymouth Avenue Buffalo, New York 14213 Ten Units • 545 Swan Street Buffalo, New York 14204 Seven Units.

HOME funding assisted seven (7) CHDO Homebuyer Units and four (4) CHDO Rental Units for a total of eleven (11) CHDO units. The program increased the availability of quality affordable existing housing for low-income first-time homebuyers and very low-income renters. Qualified CHDOs rehabilitated these housing units, which would have otherwise been demolished. The CHDO program provided funds to assist qualified organizations with developing affordable homebuyer and rental housing. The funding was used for the rehabilitation, environmental remediation, eligible soft costs as well as providing Direct Homebuyer Assistance (Down Payment and Closing Cost Assistance and Purchase Price Reduction Subsidies).

In addition to providing funding, The City of Buffalo is actively involved in facilitating access to affordable housing for homeless individuals by serving on the Continuum of Care (CoC) Project Selection Committee. This allows a wide-lens perspective on all funded project related to CoC and ESG which gives the City insights into trends and barriers related to homelessness. During the 2018-2019 program year, the City of Buffalo funded two rapid rehousing efforts: one aimed at adults and families and one which specifically targeted young adults ages 17-24. The City also continued contracts with Housing Opportunities Made Equal (HOME) which is designed to assist in housing search, inspections, lead visual and assessments when warranted, rent reasonableness and fair market rent requirements. This helps to reduce the length of stay for individuals in shelters or other inhabitable conditions and maintains a smooth RRH process.

The City of Buffalo contracted with Evergreen Health Services, Inc. (EHS) to provide Housing assistance for individuals and families living with HIV/AIDS. EHS provided 32 long-term rental assisted units at our 56-unit Low-Income Tax Credit Property, located at 392 Genesee Street, Buffalo, NY 14204. This apartment building opened in August of 2016 and has provided a safe space for a diverse population. Individuals who are part of the 32 FBRA subsidized units receive supportive services from the onsite Housing Retention Counselor. Some of the supportive services received include, assisting with obtaining a source of stable income and entitlements, referrals to medical and mental health providers, crisis management, budgeting and other daily living activities. In addition, tenants receive monthly rental subsidies based upon the tenant's income.

4. Summary of citizen participation process and consultation process

The City of Buffalo's goal for citizen participation is to ensure a broad participation of City residents, and housing, economic, and service providers in the planning and implementation of community development and housing programming. Citizen participation takes the form of

advertised stakeholder interviews, pop-up events, stakeholder meetings and public needs meetings.

The planning process for the preparation of the Five-Year Consolidated Plan and the FY 2020 Annual Action Plan included the following distinct elements:

- The engagement process for this project included one survey, five stakeholder workshops, two public meetings, two pop-up engagements, and a public hearing at a Buffalo City Council meeting.
- Focus group sessions with representatives from City government (staff), non-profit organizations, and other service providers to gain stakeholder input on the identification of City needs.
- Additional meetings and interviews with City departmental staff and other provider agencies and stakeholders throughout the planning process to understand the current scope of programs, issues, and concerns. The one-on-one conversations helped to develop strategies to address the community needs that were identified in the focus group sessions.
- Pop-up events were held in locations across the City to encourage engagement in the process. Engagement activities included having I-Pads available with the online survey, a budgeting exercise, and public meeting advertisements.
- The City of Buffalo also utilized social media to encourage citizen participation. The full Public Participation Plan is located in the unique appendix.
- Review of existing community development-related planning documents, including the 2019 Analysis of Impediments to Fair Housing, and Buffalo Housing Opportunity Strategy.

5. Summary of public comments

[completed after 30-day public display]

6. Summary of comments or views not accepted and the reasons for not accepting them

[completed after 30-day public display]

7. Summary

The Consolidated Plan is a prerequisite for receiving funding through the Department of Housing and Urban Development for four federal entitlement programs: Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). The purpose is to guide funding decisions regarding the use of federal resources. The City has prepared this CP to strategically implement federal programs that fund housing, community development and economic development activities within the City over the next five years—from October 1, 2020 to September 30, 2025.

THE PROCESS

PR-05 LEAD & RESPONSIBLE AGENCIES 24 CFR 91.200(B)

Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	BUFFALO	City of Buffalo and Buffalo Urban Renewal Agency
HOPWA Administrator	BUFFALO	City of Buffalo
HOME Administrator	BUFFALO	City of Buffalo and Buffalo Urban Renewal Agency
ESG Administrator	BUFFALO	City of Buffalo
HOPWA-C Administrator	BUFFALO	City of Buffalo

Table 1 – Responsible Agencies

Narrative

Grant agreements are with the City of Buffalo. The Mayor's Office of Strategic Planning (OSP) is responsible for program administration; the Department of Audit and Control for fiscal administration; and the Department of Administration and Finance for fiscal management. While the primary responsibility for the administration of CDBG, HOME, ESG, and HOPWA programs is with OSP, the City will enter into an agreement with the Buffalo Urban Renewal Agency to assist with carrying out CDBG and HOME grant activities, and to ensure compliance with regulatory requirements.

The City Charter authorizes the Department of Administration and Finance to participate in the investigation, supervision and coordination of expenditures and other fiscal operations of departments, boards and agencies. It directs, coordinates, and administers the fiscal management of all federal- and state-funded programs and related agencies; including financial planning, management, program or project budgets, accounting, auditing, budget control, financial statements, federal reporting, receipts and disbursements of grants, and contract administration involving the system of reporting, monitoring and auditing third-party contracts. OSP will also work with the Housing Division, the Community Planning Division, the Division of Citizen Services, and the Departments of Community Services, Permits & Inspections, and Public Works to ensure that projects meet all HUD timeliness requirements.

Consolidated Plan Public Contact Information

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1. Introduction

Significant consultation to determine community needs occurred with citizens, neighborhood groups, nonprofits, and governmental agencies. Stakeholder workshops were held early in the process with affordable housing providers, fair housing advocates, business associations, homeless providers, community development organizations, and human service providers. Online surveys were also distributed to these organizations to obtain more detailed information on community needs. Consultation occurred with the Homeless Alliance of Western New York to develop strategies to reduce homelessness and allocate Emergency Solutions Grant funding; with the Green and Healthy Homes Initiative to address lead-based paint hazards; and with the Buffalo Municipal Housing Authority to ensure that the needs of the community were taken into consideration.

During the preparation of the Consolidated Plan the world was impacted by the COVID-19 pandemic. While many of the needs outlined in this Consolidated Plan are still true today, many are exacerbated by the social, economic, and health crisis facing the world. While the City has utilized CARES Act funds to address some of the needs presented by the pandemic, there are longer lasting impacts that will continue to need attention and intervention.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

During the week of February 10, 2020, the City held focus groups with stakeholders to discuss the Consolidated Plan and funding priorities. Affordable/special needs housing providers, fair housing advocates, business associations, homeless assistance providers, developers, and health and human services providers were all represented. The focus groups addressed housing and other community development needs within the City, and shared best practices in carrying out programs.

On February 12, 2020, Mullin and Lonergan Associates consulted the Buffalo Municipal Housing Authority to discuss public housing needs and the public housing component of the Consolidated Plan.

As part of the public engagement process online surveys were distributed to local business leaders, health and human service providers, fair housing organizations, affordable housing providers, community development corporations, homeless assistance providers, public transportation agencies, and public housing/voucher providers. A total of 537 surveys were returned, and the data was summarized and used to prepare the plan.

The City enhances coordination with respect to workforce development through its support of the Buffalo Employment & Training Center (BETC). BETC brings together a variety of workforce development organizations and partner agencies with the primary goal of assisting residents of Buffalo and Erie County to gain employment and assist employers in finding qualified workers.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

Feedback from representatives of the Homeless Alliance of Western New York (HAWNY) and a review of materials posted on the website were used to coordinate efforts to address the needs of homeless persons. The discussion addressed general trends of the homeless population in Buffalo and the resulting priorities. In the HAWNY's 10 Year Plan to End Homelessness (2012-2022) commitments are outlined for the overall goals of ending homelessness, but also ending homelessness among special populations. HAWNY is committed to finishing the job of ending chronic homelessness. While the Continuum of Care (CoC) is on track, they are facing difficulty housing the hardest to serve clients. Clients with criminal backgrounds, violent behavior and/or severe disabilities require more intensive services. The CoC also is committed to preventing and ending homelessness among veterans. They will continue to implement strategies learned in the functional zero campaign. The CoC also is committed to preventing and ending homelessness among families. They look to collaborate with housing developers to create affordable housing for clients in the homeless system and utilize Rapid Rehousing to provide short-term financial assistance to families in shelter.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The Continuum of Care (CoC) is responsible for coordinating and implementing a system to meet the needs of the population and subpopulations, such as youth, Veterans, chronically homeless, etc., experiencing homelessness within a given geographic area, which includes: Buffalo/ Erie, Niagara Falls/Niagara, Orleans, Genesee, and Wyoming Counties. Both the Emergency Solution Grant (ESG) Rules and Regulations and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rules state that the CoC, in consultation with recipients of Emergency Solutions Grants (ESG) program funds within the geographic area, are responsible to (1) establish and consistently follow written standards for providing Continuum of Care assistance, (2) establish performance targets appropriate for population and program type, and (3) monitor recipient and subrecipient performance. These written standards have been established to ensure that persons experiencing homelessness who enter programs throughout the CoC will be given similar information and support to access and maintain permanent housing. All programs that receive ESG or CoC funding are required to abide by these written standards. Agency program procedure should reflect the policy and procedures described in this document. The CoC strongly encourages programs that do not receive either of these funding sources to accept and utilize these written standards.

The majority of these standards are based on the ESG and/or the HEARTH Interim Rules. There are additional standards that have been established by the CoC to assist programs in meeting and exceeding performance outcomes that will help to reach the goal of ending homelessness.

The Continuum of Care Written Standards will include policies and procedures for

- evaluating individuals' and families' eligibility for assistance
- determining and prioritizing which eligible households will receive Transitional Housing, Safe Haven and Permanent Supportive Housing, Rapid rehousing funded by the CoC and ESG
- standards for determining what percentage and amount of rent each household must pay while receiving RRH assistance
- common performance measurements and benchmarks.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

1	Agency/Group/Organization	Buffalo Planning Department
	Agency/Group/Organization Type	Other government-local
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was consulted via multiple in-person group interviews. The goal of the interview was to obtain information on the affordable housing needs of the City.
2	Agency/Group/Organization	Buffalo Department of Community Services
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Non-Homeless Special Needs HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was consulted via multiple in-person group interviews. The goal for the interview was to obtain information on access to recreational activities for youth and adults in the low-moderate income population.
3	Agency/Group/Organization	Restoration Society, Inc.
	Agency/Group/Organization Type	Services-persons with disabilities
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Non Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person interview. The goal of the interview was to obtain information on the City's efforts to provide substance use services to Low Income residents.
4	Agency/Group/Organization	People Inc
	Agency/Group/Organization Type	Services—persons with disabilities
	What section of the Plan was addressed by Consultation?	Non Homeless Special Needs Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person interview. The goal of the interview was to obtain information on the City's efforts to provide services and housing to persons with disabilities.
5	Agency/Group/Organization	NeighborWorks Community Partners
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group interview. The goal of the interview was to obtain information on the affordable housing needs of the clients served by the agency.
6	Agency/Group/Organization	University District Community Development Association
	Agency/Group/Organization Type	Services-Children and Elderly Persons Housing
	What section of the Plan was addressed by Consultation?	Non Homeless Special Needs Housing Need Assessment

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group interview. The goal of the interview was to obtain information on the affordable housing needs of the clients served by the agency.
7	Agency/Group/Organization	Evergreen Health Services
	Agency/Group/Organization Type	Housing Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group interview. The goal of the interview was to obtain information on the affordable housing needs and supportive services of the clients served by the agency.
8	Agency/Group/Organization	Harvest House
	Agency/Group/Organization Type	Services- Health Services- Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group interview. The goal of the interview was to obtain information on the affordable housing needs of the clients served by the agency.
9	Agency/Group/Organization	Buffalo Municipal Housing Authority
	Agency/Group/Organization Type	Housing Services-Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an in-person group interview. The goal of the interview was to obtain information on the affordable housing needs of the clients served by the agency.
10	Agency/Group/Organization	Buffalo Municipal Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was consulted via an in-person group interview. The goal of the interview was to obtain information on the needs of the Public Housing residents served by the agency.
11	Agency/Group/Organization	Homeless Alliance of Western New York
	Agency/Group/Organization Type	Services- Homelessness
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Needs – Veterans Homeless Needs—Families with Children Homeless Needs—Unaccompanied Youth Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	This agency was consulted via an in-person group interview. The goal of the interview was to obtain information on the nature of homelessness in the City and the specific needs of certain homeless populations.

Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

There were no agencies that were not consulted.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
A New Way to Plan for Buffalo Niagara	One Region Forward	Aligns with the planning and economic goals outlined in the Strategic Plan.
Buffalo Niagara's Strategic Plan for Prosperity	WNY Regional Economic Development Council	Strategic Plan goals for economic development and community development overlap with comprehensive plan goals
Buffalo Housing Opportunity Strategy	City of Buffalo	Goals and Strategies identified in the Housing Opportunity Strategy are consistent with the Strategic Plan
Analysis of Impediments to Fair Housing Choice	Erie County	Goals and Strategies identified in the Analysis of Impediments to Fair Housing Choice are consistent with the Strategic Plan

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

In accordance with 24 CFR 91.100(4), the City of Buffalo will notify adjacent units of local government of the non-housing community development needs included in its Consolidated Plan. The City will continue to interact with public entities at all levels to ensure coordination and cooperation in the implementation of the Consolidated Plan and thereby maximize the benefits of the City's housing and community development activities for the residents being served.

PR-15 CITIZEN PARTICIPATION

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

The City of Buffalo recognizes that a successful plan requires input from a broad array of stakeholders. The Public Participation Plan develops a public engagement process for the Five-Year Consolidated Plan. The plan defined key stakeholders, engagement tools, and outlined a meeting schedule to engage a wide variety of stakeholders throughout the study process. Finally, the plan formalized the commitment of the City of Buffalo to solicit meaningful input and engage the public throughout the project on the following topics:

1. Community Revitalization
2. Economic Development
3. Housing
4. Homelessness & Special Needs

In order to gain agency and stakeholder perspectives, Mullin and Lonergan Associates and Highland Planning conducted five (5) pre-engagement interviews with key stakeholders in October and November of 2019. The purpose of the preliminary stakeholder interviews was to learn how stakeholders are likely to perceive the project and what the likely issues will be.

Interviewees included representatives from:

- Restoration Society
- NeighborWorks Community Partners
- People, Inc.
- University District Community Development Association
- Homeless Alliance of Western NY

The pre-engagement interviews resulted in feedback that, in general, stakeholders think the City is allocating HUD funds toward current needs and demands. However, the demand is greater than the HUD allocation. Stakeholders suggested that public meetings should be held within the community at locations accessible by public transit. Stakeholders also noted that connecting with the community development organizations and other housing partners will be an effective way to solicit maximum feedback.

Stakeholder Interview Results

The week of February 10th, 2020, the City of Buffalo held a series of stakeholder workshops to support the development of a five-year Consolidated Plan and the 2020 Annual Action Plan. The City of Buffalo hosted four (4) workshops to provide an extended working session to coordinate with a diverse group of stakeholders on solutions and related implementation strategies. Each stakeholder workshop focused on a specific topic.

Community Revitalization

Tuesday, February 11, 2020 from 10:30 am – 12:00 pm

Northland Workforce Training Center (683 Northland Ave.)

Economic Development

Tuesday, February 11, 2020 from 1:30 – 3:00 pm
Northland Workforce Training Center (683 Northland Ave.)

Housing

Wednesday, February 12, 2020 from 1:00 – 2:30 pm
Northwest Buffalo Community Center (155 Lawn Ave.)

Homelessness & Special Needs

Thursday, February 13, 2020 from 10:30 am – 12:00 pm
Belle Center (104 Maryland St.)

The purpose of these 90-minute workshops was to evaluate existing programs and gather stakeholder perspectives on improvement and formulation of new programs based on resident needs throughout the City of Buffalo.

The City of Buffalo hosted a public meeting as part of the project. The purpose of these public meetings is to inform the public of the project, solicit feedback regarding needs, experiences, opportunities and challenges, and to brainstorm solutions for the City of Buffalo. General questions and comments received from the meeting participants were:

- Stabilize vacant properties
- Stop property owners from leaving vacant properties and creating blight
- Commercial development assistance: need more information about what is available and where to go
- Libraries on the east side
- After school activities for youth
- Affordable housing (both subsidized and market rate affordable)
- More assistance for low/mod homeownership
- Address blight; redevelop vacant homes; don't demolish houses
- Tiny house communities for homeless and veterans. Does the zoning code allow this?
- Ongoing need for repair and rehab funding
- Community economic development; improvements for small business
- Youth (specific behavioral issues); need more family services; parenting resources

Participants were given four \$1 play dollars and provided the opportunity to invest the money across six categories according to what they thought were most important for the City to address. The categories included Community Revitalization, Workforce & Economic Development, Housing, Homelessness & Special Needs, Parks, and Infrastructure & Transportation. The highest priority across all categories was given to Community Revitalization, followed by Workforce & Economic Development and Housing.

Community Needs Survey

An online resident survey was conducted as part of the community outreach for the five-year Consolidated Planning processes. This document is required by HUD in order for the City of Buffalo to remain in compliance with the Community Development Block Grant, HOME

Partnerships Investment, Emergency Solutions Grant (ESG), and Housing Opportunities for persons with AIDS (HOPWA) programs. The following is an overview of the results for the City of Buffalo responses.

The survey was made available in English and Spanish. There were 537 responses received, only one person responded to the Spanish version.

The survey asked respondents to select the category that best represents them. Of the 536 responses, 13% identified as a stakeholder and 87% were city residents.

Stakeholder specific questions

The survey asked a series of questions specifically for stakeholders. Of the 36 stakeholders who answered these questions, more than half worked with the **elderly** (59.4%), followed by **persons with cognitive, mental health, or developmental disabilities** (38%), and **persons with physical disabilities** (34%). Stakeholders were asked to describe in their opinion, what the major unmet housing and/or supportive service needs faced by their organization. Of the 25 responses, **the most noted need was affordable housing, both in the rental and homeownership markets.**

Stakeholders were also asked if their organization develops housing. Of the 29 respondents, 45% replied no, 31% replied yes, and 21% replied not currently. For the organizations that replied yes, respondents answered a question about the type and number of units their organization planned to build in the next five years. Nine stakeholders responded, 75% of which are developing affordable rental units. Numbers of units ranged from 2-500 (rental) and 5-15 (for sale).

All respondent questions

The survey asked respondents to prioritize housing and community development initiatives. Of the 356 responses to the question asking them to prioritize a list of housing activities, **affordable housing and energy-efficiency improvements** were highest, followed by owner-occupied housing rehabilitation.

Of the 351 responses to the question asking them to rank a list of economic development initiatives, **vocational training/programs** was the top priority followed by job creation/retention and literacy programs/GED preparedness.

Of the 350 responses to the questions asking them to rank a list of special needs and services, **mental health services** received the highest priority, followed by elderly services and domestic violence services.

Of the 351 responses to the question asking them to rank a list of neighborhood or commercial district revitalization activities, the highest priority was **sidewalk improvements** followed by street lighting and street/alley improvements.

Among the 351 responses to the question asking them to rank a list of community facilities, **parks and recreation facilities** ranked highest, followed by mental health facilities and childcare centers.

Of the 351 responses to the question asking them to rank a list of public infrastructure initiatives, **road reconstruction** was the highest priority, followed by sidewalk reconstruction and water system improvements/extensions.

When asked to identify what should be the City's highest priorities for the next five years, infrastructure improvements, including bike lanes, sidewalks and streets were the most often cited priorities among the 78 respondents. This was closely followed by green space and parks

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Pop-Ups	All community residents	Information booth and I-Pad for survey. No attendance taken.	n/a	n/a	n/a
2	City Staff Workshop	City staff and City Council Members	15 attendees	See Appendix	none	n/a
3	Stakeholder Workshops	Housing and community development stakeholders	Community Revitalization (0 participants) Economic Development (1 participant) Housing (6 participants) Homelessness & Special Needs (5 participants)	See Appendix	none	n/a
4	Public Meetings	All community residents	Twenty-two (22) people attended the meeting.	See appendix	none	n/a
5	Online survey	All community residents		See appendix	None	https://www.surveymonkey.com/r/Bufalo-NY
6	Newspaper Ads	All community residents	Notice of availability of the FY 2020-FY 2024 Consolidated Plan and the FY 2020 Annual Action Plan for public review and comment was	n/a	n/a	n/a

			published in local newspapers.			
7	Public Comment Period	All community residents	[add after public comment]	[add after public comment]	n/a	n/a
8	Internet	All community residents	Information about the Consolidated Plan and Annual Action Plan were posted on the City of Buffalo's Office of Strategic Planning's website.	n/a	n/a	https://www.buffalony.gov/324/Consolidated-Plan-Documents

Table 4 – Citizen Participation Outreach

NEEDS ASSESSMENT

NA-05 OVERVIEW

Needs Assessment Overview

The needs assessment is based on an analysis of housing problems in The City of Buffalo by income level among renters, owners, and households with special needs. Needs were also identified through a comprehensive public outreach process that included stakeholder consultation, public hearings, pop-up events, an online resident survey, and a review process designed to meaningfully engage citizens. All outreach was conducted prior to the COVID-19 pandemic. The needs outlined in the following sections remain true, however many may be exacerbated, and new needs will be identified over the coming months.

Data in this section was drawn primarily from HUD's Comprehensive Housing Affordability Strategy (CHAS) data set, which is a special tabulation of 2009-2013 American Community Survey (ACS) data from the Census Bureau. The CHAS data describes housing problems, such as overcrowding or incomplete kitchen and/or plumbing facilities, as well as cost burden, which occurs when a household pays more than 30% of its gross income on housing costs. Severe cost burden occurs when a household pays more than 50% of its gross income on housing costs.

Supplemental data were drawn from the 2009-2013 ACS 5-Year Estimates and other sources to provide additional context when needed.

- According to CHAS data for all households, 16.6% of City households are cost burdened and 22.7% of households are severely cost burdened.
- Other households, which are predominately single person households have higher rates of being cost burdened and severely cost burdened.
- Asian households 50-80% AMI and 80-100% AMI in The City of Buffalo experience one or more housing problems at a disproportionate level. (small sample size)
- Racial/ethnic groups experiences one or more severe housing problems at a disproportionate level:
 - Asian households at 30-100% AMI (small sample size)
 - American Indian, Alaska Native households at 30-100% AMI (small sample size)
 - Hispanic households at 50-80% AMI

NA-10 HOUSING NEEDS ASSESSMENT - 24 CFR 91.205 (A, B,C)

Summary of Housing Needs

High housing costs reduce economic opportunities and access to prosperity, especially among lower-income city households. Real incomes in the area have declined while housing costs have risen, resulting in an increase in the need for affordable housing options. Between 2009 and 2015, the median income for City residents actually *declined* by 5% after adjusting for inflation, while median rent *increased* by 7% and median home values *decreased* by 5%. This means that housing costs take up a relatively larger share of income for rental households in the City compared to 2009. The combination of falling inflation-adjusted income and rising housing costs translates to diminished buying power for rental households. Given a lack of decent, affordable housing options, the City's lower-income households often face a choice between deficient housing and cost burden.

As the data below show, the most significant housing issue identified is severe cost burden, defined as spending over 50% of household income on housing. In Buffalo, 22.7% of households are severely cost burdened. Similarly, according to CHAS data, 16.6% of City households are cost burdened defined as spending over 30% of household income on housing costs, such as mortgage and rent payments. Renters are much more likely than homeowners to experience housing problems, among which cost burden is the most prevalent. Renters at the lowest end of the income spectrum, 0-30% AMI, are most likely to be severely cost burdened.

The following tables are HUD-generated tables within the IDIS eCon Planning Suite using 2011-2015 CHAS data and 2011-2015 ACS data. HAMFI refers to "HUD Adjusted Median Family Income," which is the median family income calculated by HUD for each jurisdiction in order to determine Fair Market Rents and income limits for HUD programs.

SUPPLEMENTAL CHART: Housing Needs, Adjusted for Inflation

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	261,310	259,515	-1%
Households	117,789	110,550	-6%
Median Income	\$30,376.00	\$31,918.00	5%
	Adjusted for inflation \$33,622.16	2009 dollars are adjusted for comparison to 2015's dollars	Adjusted for inflation -5.07%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Housing Costs Table

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	65,200 (\$72,167.66 in 2015)	68,800	6% -4.67%
Median Contract Rent	453 (\$501.41 in 2015)	538	19% 7.3%

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	30,825	18,155	19,665	9,910	31,995
Small Family Households	9,570	6,245	7,195	3,885	14,060
Large Family Households	2,610	1,320	1,090	625	1,830
Household contains at least one person 62-74 years of age	4,140	3,000	3,675	2,105	5,645
Household contains at least one person age 75 or older	2,775	2,875	2,385	870	2,025
Households with one or more children 6 years old or younger	6,230	3,100	2,585	1,035	3,330

Table 6 - Total Households Table

Data 2011-2015 CHAS
Source:

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	1,140	370	375	60	1,945	95	40	85	40	260
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	110	120	90	0	320	35	30	35	15	115
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	525	135	125	70	855	135	135	85	70	425

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
Housing cost burden greater than 50% of income (and none of the above problems)	15,965	2,075	200	10	18,250	2,680	1,330	345	200	4,555
Housing cost burden greater than 30% of income (and none of the above problems)	3,005	6,040	2,670	235	11,950	975	1,580	1,595	315	4,465
Zero/negative Income (and none of the above problems)	2,105	0	0	0	2,105	375	0	0	0	375

Table 7 – Housing Problems Table

Data 2011-2015 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	17,740	2,700	790	140	21,370	2,945	1,535	550	325	5,355
Having none of four housing problems	5,775	9,130	10,150	4,670	29,725	1,880	4,790	8,175	4,775	19,620
Household has negative income, but none of the other housing problems	2,105	0	0	0	2,105	375	0	0	0	375

Table 8 – Housing Problems 2

Data 2011-2015 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	7,420	2,995	1,075	11,490	870	1,070	695	2,635
Large Related	1,740	635	95	2,470	460	95	75	630
Elderly	2,850	1,440	535	4,825	1,650	1,280	615	3,545
Other	8,340	3,480	1,230	13,050	845	540	650	2,035
Total need by income	20,350	8,550	2,935	31,835	3,825	2,985	2,035	8,845

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	6,655	695	50	7,400	630	435	175	1,240
Large Related	1,360	125	0	1,485	295	55	15	365
Elderly	1,885	330	45	2,260	1,230	525	110	1,865
Other	7,285	1,130	100	8,515	635	355	65	1,055
Total need by income	17,185	2,280	195	19,660	2,790	1,370	365	4,525

Table 10 – Cost Burden > 50%

Data 2011-2015 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	520	305	235	45	1,105	150	120	95	70	435
Multiple, unrelated family households	95	4	10	30	139	25	45	25	15	110
Other, non-family households	40	0	0	10	50	0	0	0	0	0
Total need by income	655	309	245	85	1,294	175	165	120	85	545

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

The above chart prepopulates from HUD’s IDIS system with no data. There is no local data collected on crowding for households with children present.

Describe the number and type of single person households in need of housing assistance.

In Buffalo, 39.7% of units are occupied by single person households.

Among renters, 46% of households are single individuals; while among owners, 32% are singles.). The median household income for a single female household (\$18,139) is just half the median income for the City, while single male households have a median income of \$25,509. This indicates that single female households are more likely to be cost burdened or severely cost burdened than male households.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

In the City of Buffalo, 16.7% of the population has a disability. This rate increases for residents over the age of 65 (42.9%). Households with a disability are more likely to live below poverty. Over 80% of households over the age of 65 with a disability are living below the poverty level.

Domestic Violence

In 2018 the City of Buffalo Police Department reported 3,500 domestic violence crime victims. Child and Family Services operates a fully inclusive, safe, and secure emergency shelter in a confidential location to help survivors of domestic violence escape their abusers, Haven House. In their 2018-2019 Annual Report, Haven House served 363 children, women and men in the emergency shelter.

What are the most common housing problems?

As mentioned above, housing cost burden is the most significant housing problem in the City of Buffalo. According to the 2017 *Buffalo Housing Opportunity Study* researchers note “low-incomes are the root cause of affordability problems — not housing costs, which remain among the lowest in the country.” Buffalo’s housing market has begun to stabilize; however, this is not true in all parts of the City. Stakeholders note that in neighborhoods that are higher demand and most sought-after have rising prices and rents, however there are still parts of the community where rents and housing prices are lower. These neighborhoods often have substandard housing and few amenities.

Are any populations/household types more affected than others by these problems?

Other households, which are predominately single person households have higher rates of being cost burdened and severely cost burdened, followed by large related households. Across all household compositions, renter and owner households making 0-30% AMI were the most impacted by cost burden. Stakeholders note that seniors are facing challenges to perform routine maintenance on homes, causing major damage in the long term.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

During stakeholder meetings, providers discussed a number of issues that could lead to homelessness. There are several households who own their homes but are one paycheck away from foreclosure. Due to the low incomes in Buffalo, many residents do not have the funds saved for emergencies. This puts them at risk for losing their homes. Providers mention utility bills are also a barrier to housing stability. Due to the very low income of residents in the City of Buffalo, providers discussed the need for income-based housing in some areas of the City. Neighborhoods that are most desirable are out of reach for many low-income residents, forcing people to move into substandard housing in less desirable neighborhoods. Some of these neighborhoods have less access to quality transportation and services.

The Homeless Alliance of Western New York's (2018), *Voices for 2020: Ending Family Homelessness* meeting with focus groups of currently and formally homeless families along with other key stakeholders with the goal of developing a clearer picture of the physical, psychological, social, and resource needs of homeless families living in Erie, Niagara, Genesee, Orleans, and Wyoming Counties. The report notes:

The vast majority of homeless adults participating in the Voices for 2020 study highlighted their struggles with housing – suggesting the high cost of rent and challenges associated with locating housing near places of employment was one of the primary reasons they eventually found themselves within the homeless system.

Buffalo, which is known for its severe and persistent poverty, is now experiencing greater demand for market-rate and even luxury housing. Coupled with generous subsidies to housing developers, available properties are being snatched up. Rental and housing costs are on the rise and low-income individuals are quickly being priced out of affordable housing options. (p 3)

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

There is no specific local metric to estimate the number of households who are at risk of homelessness in the City of Buffalo. According to the March 2020 report *Evicted in Buffalo: the High*

Costs of Involuntary Mobility “in 2017, landlords filed 8,530 eviction cases and obtained 4,383 eviction warrants in a city with 65,227 renting households.” According to the ATTOM Data Solutions’ November 2019 U.S. Foreclosure Activity report, among the 220 metropolitan statistical areas (MSA) with at least 200,000 people, the Buffalo MSA, which includes Erie and Niagara counties, had the highest foreclosure rates in November 2019 (one in every 798 housing units).

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Very low-income households are often linked to housing instability and an increased risk of homelessness. Stakeholders report that households must frequently choose between substandard housing that is affordable and decent housing that is unaffordable.

Discussion

The most significant housing issue identified is severe cost burden, defined as spending over 50% of household income on housing. In Buffalo, 22.7% of households are severely cost burdened. Similarly, according to CHAS data, 16.6% of City households are cost burdened defined as spending over 30% of household income on housing costs, such as mortgage and rent payments. Renters are much more likely than homeowners to experience housing problems, among which cost burden is the most prevalent. Renters at the lowest end of the income spectrum, 0-30% AMI, are most likely to be severely cost burdened.

NA-15 DISPROPORTIONATELY GREATER NEED: HOUSING PROBLEMS – 91.205 (B)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD defines a disproportionately greater housing need when a racial or ethnic group experiences housing problems at a rate over 10 percentage points than that of the corresponding income level as a whole. The data table below summarizes the percentage of each racial/ethnic group experiencing housing problems by HUD Adjusted Median Family Income (HAMFI) levels. Housing problems include:

- Housing units lacking complete kitchen facilities and/or complete plumbing facilities
- Overcrowding (more than one person per room)
- Housing costs greater than 30% of income (i.e., cost burden)

In general, the percentage of households with a housing problem is highest for the lowest income brackets (0-50% AMI) and decreases as income increases. According to the above definitions, Asian households (small sample size 485 and 189) 50-80% AMI and 80-100% AMI in The City of Buffalo experience one or more housing problems at a disproportionate level.

Supplemental Chart: Housing Problems by Race and Income

	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI
Racial/ Ethnic Group	% with one or more housing problems			
White	87.5%	62.1%	26.4%	8.8%
Black/ African American	86.7%	67.7%	27.1%	12.8%
Asian	95.4%	59.0%	49.5%	26.5%
Hispanic	85.4%	68.5%	34.4%	7.1%
Jurisdiction as a Whole	87.0%	65.3%	28.5%	10.2%
Source: CHAS 2011-2015				

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	24,670	3,675	2,480

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	7,435	1,065	685
Black / African American	12,260	1,875	1,225
Asian	710	34	105
American Indian, Alaska Native	165	14	0
Pacific Islander	0	0	0
Hispanic	3,420	585	360

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	11,860	6,295	0
White	4,810	2,935	0
Black / African American	5,105	2,440	0
Asian	295	205	0
American Indian, Alaska Native	55	14	0
Pacific Islander	0	0	0
Hispanic	1,370	630	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,605	14,060	0
White	2,640	7,370	0
Black / African American	1,975	5,310	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Asian	240	245	0
American Indian, Alaska Native	120	35	0
Pacific Islander	0	0	0
Hispanic	490	935	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,010	8,895	0
White	500	5,190	0
Black / African American	420	2,855	0
Asian	50	139	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	0	0
Hispanic	40	525	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

The percentage of households with a housing problem is highest for the lowest income brackets (0-50% AMI) and decreases as income increases. There are just 240 Asian households at 50-80% AMI, and 50 at 80-100% AMI that experience one or more housing problems at a disproportionate level.

NA-20 DISPROPORTIONATELY GREATER NEED: SEVERE HOUSING PROBLEMS – 91.205 (B)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD defines a disproportionately greater housing need when a racial or ethnic group experiences housing problems at a rate over 10 percentage points than that of the corresponding income level as a whole. The data table below summarizes the percentage of each racial/ethnic group experiencing severe housing problems by HUD Adjusted Median Family Income (HAMFI) levels.

Severe housing problems include:

- Housing units lacking complete kitchen facilities and/or complete plumbing facilities
- Overcrowding (more than 1.5 persons per room)
- Housing costs greater than 50% of income (i.e., cost burden)

In general, the percentage of households with a severe housing problem is high for the lowest income brackets (0-50% AMI) and decreases as income increases. According to the above definitions, the following racial/ethnic groups experiences one or more severe housing problems at a disproportionate level:

- Asian households at 30-100% AMI (small sample size 1,174)
- American Indian, Alaska Native households at 30-100% AMI (small sample size)
- Hispanic households at 50-80% AMI

Supplemental Chart: One or more housing problems by race and income level

	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI
Racial/ Ethnic Group	% with one or more severe housing problems			
White	73.7%	22.7%	5.7%	3.6%
Black/ African American	72.8%	21.3%	5.3%	5.5%
Asian	76.0%	46.0%	19.6%	26.5%
American Indian, Alaska Native	81.0%	0.0%	33.3%	0.0%
Pacific Islander	0.0%	0.0%	0.0%	0.0%
Hispanic	69.8%	25.5%	13.3%	6.2%
Jurisdiction as a Whole	73.0%	23.3%	6.8%	4.7%
Source: CHAS 2009-2013				

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	20,685	7,655	2,480
White	6,260	2,235	685
Black / African American	10,285	3,850	1,225
Asian	570	180	105
American Indian, Alaska Native	145	34	0
Pacific Islander	0	0	0
Hispanic	2,795	1,210	360

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,235	13,920	0
White	1,760	5,980	0
Black / African American	1,610	5,935	0
Asian	230	270	0
American Indian, Alaska Native	24	50	0
Pacific Islander	0	0	0
Hispanic	510	1,490	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,340	18,325	0
White	575	9,430	0
Black / African American	385	6,905	0
Asian	95	390	0
American Indian, Alaska Native	50	100	0
Pacific Islander	0	0	0
Hispanic	190	1,235	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	465	9,445	0
White	205	5,485	0
Black / African American	180	3,090	0
Asian	50	139	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	0	0
Hispanic	35	530	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

The percentage of households with a severe housing problem is high for the lowest income brackets (0-50% AMI) and decreases as income increases. The following racial/ethnic groups experiences one or more severe housing problems at a disproportionate level:

- Asian households at 30-100% AMI (small sample size)
- American Indian, Alaska Native households at 30-100% AMI (small sample size)
- Hispanic households at 50-80% AMI

NA-25 DISPROPORTIONATELY GREATER NEED: HOUSING COST BURDENS – 91.205 (B)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

HUD defines a disproportionately greater housing need when a racial or ethnic group experiences housing problems at a rate over 10 percentage points than that of the corresponding income level as a whole. Cost-burdened is defined as paying more than 30% of household income on housing, and severely cost burdened is defined as paying greater than 50% of household income on housing.

The data table below summarizes the percentage of each racial/ethnic group experiencing cost burden at various levels. Based on these definitions, Hispanic households experience severe cost burden disproportionately than other racial and ethnic groups.; It is noteworthy that 29.7% Black/African American households, respectively, pay more than 50% of their income on housing costs.

Supplemental Chart: Cost Burden by race and income level

	Less than 30% (No Cost Burden)	30-50%	More than 50%	No/ negative income (not computed)
Racial/ Ethnic Group		% with housing cost burden		%
White	71.3%	13.7%	15.0%	1.5%
Black/ African American	51.3%	19.0%	29.7%	3.6%
Asian	52.8%	19.9%	27.3%	4.2%
Hispanic	45.6%	21.1%	33.4%	3.8%
Jurisdiction as a Whole	60.7%	16.6%	22.7%	2.6%
Source: CHAS 2009-2013				

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	65,420	17,850	24,500	2,780
White	38,295	7,355	8,050	790
Black / African American	20,265	7,515	11,710	1,410
Asian	1,325	500	685	105
American Indian, Alaska Native	185	145	190	0
Pacific Islander	35	0	0	0
Hispanic	4,335	2,005	3,175	360

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2011-2015 CHAS

Discussion:

Hispanic households have a disproportionate housing need; while 29% of Black/African American households, also pay more than 50% of their income on housing costs.

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The impact of housing problems in the City of Buffalo varies primarily by income level. However, the following income tiers experienced problems at a rate of at least ten percentage points higher than the City of Buffalo as a whole:

Housing Problems

- Asian households 50-80% AMI and 80-100% AMI experience one or more housing problems at a disproportionate level. (small sample size)

Severe Housing Problems

- Asian households at 30-100% AMI (small sample size)
- American Indian, Alaska Native households at 30-100% AMI (small sample size)
- Hispanic households at 50-80% AMI

Cost Burden

- Hispanic households have disproportionate housing need (severe cost burden)

If they have needs not identified above, what are those needs?

The needs among race/ethnicities are indicated above. Income categories have more general needs as described in NA-10 and the Housing Market Analysis.

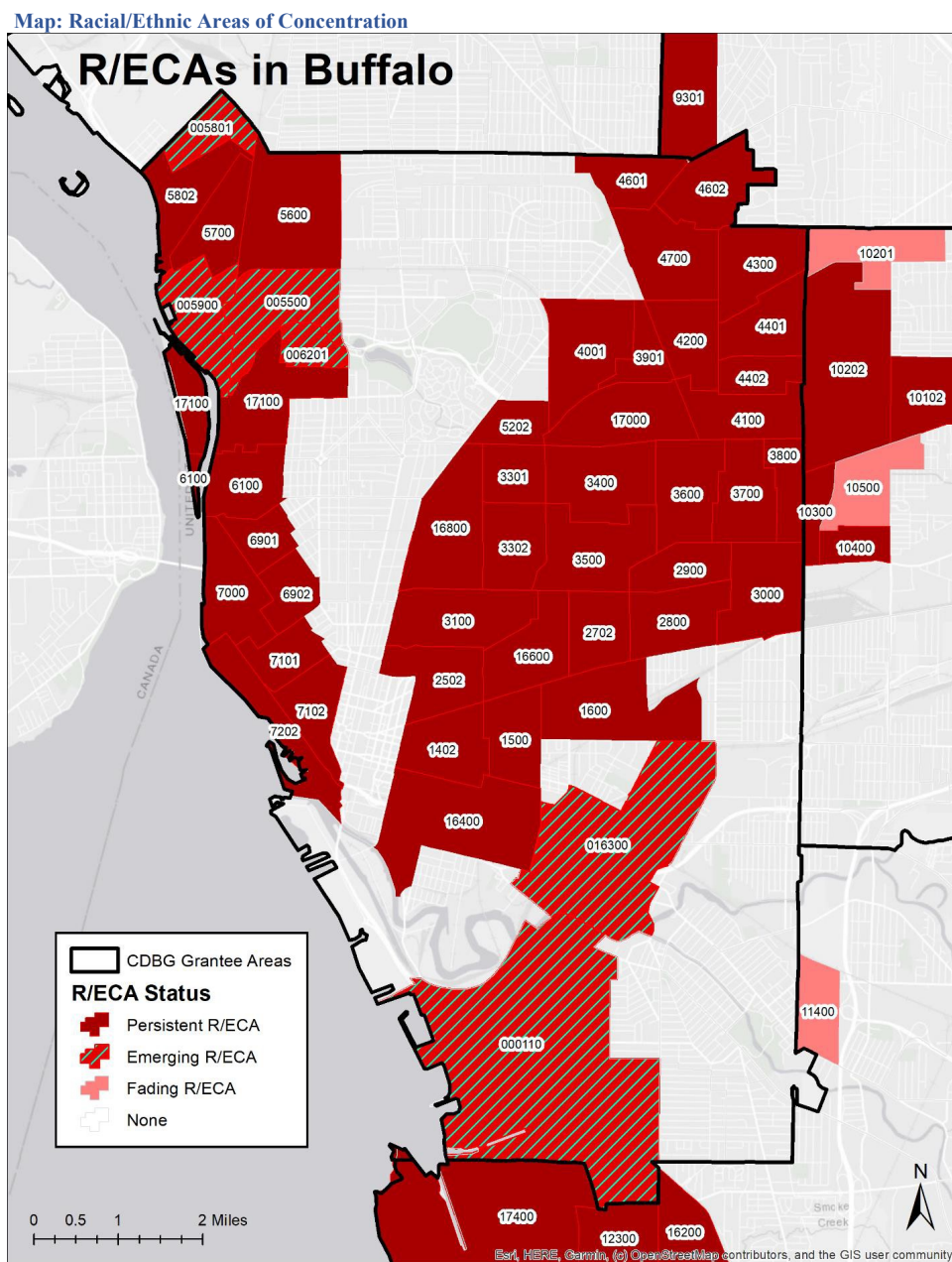
The City of Buffalo's mission is to be an inclusive and equitable City. In the *Buffalo Housing Opportunity Strategy*, it is noted that "Erie County's dissimilarity index score of 64.9—a measurement of residential segregation where 60 is considered extreme—is one of the highest in the county and is echoed within the city limits." This was echoed by stakeholders, but the community desires to change this and use strategies in development that would bring more inclusive communities. The City has adopted a goal to close the racial wealth gap and foster a community of fairness, equity, and justice. Which includes prioritization of existing funds, targeted investments and the use of a racial equity lens in programs.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

In the most recent Analysis of Impediments to Fair Housing Choice (AI), the City of Buffalo defines areas of minority concentration as spaces where "populations of racial or ethnic group are at least ten percent greater than for the city as a whole."¹³ With respect to identifying areas of minority concentration for analyzing impediments to fair housing, this definition has been interpreted to mean that areas of minority concentration are spaces where a minority group's fraction of population in that space is ten percentage points higher than the group's share of Citywide population.

According to the 2014 publication *Complete Communities for a Changing Region Housing and Neighborhood Strategies to Move One Region Forward* “a current snapshot of racial and ethnic settlement patterns reveal clear concentrations of the black population in the City of Buffalo – particularly on the city’s east side and to an extent on the city’s west side. [...] “Hispanic/ Latino population in the region is centered on the City of Buffalo’s west side, while the Asian – Pacific Islander population is also on Buffalo’s west side in addition to portions of Amherst and the northern Erie suburbs.”

Across multiple studies conducted since 2014, researchers note the racial divide in the City of Buffalo has lasting implications to housing and economic development.



NA-35 PUBLIC HOUSING – 91.205(B)

Introduction

The needs of public housing residents were identified through interviews with representatives of the Buffalo Municipal Housing Authority (BMHA) and a review of BMHA documents. Decent, safe, affordable housing is the primary need of public housing residents. The data populated in the charts below come directly from HUD and may not reflect the most recent information. The correct numbers according to the 2019 Annual Agency Plan BMHA is a total of 4,265 public housing units and 518 Housing Choice Vouchers.

Totals in Use

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	3,548	1,132	0	1,120	0	0	3,548

Table 22 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
# Homeless at admission	0	0	13	8	0	8	0	0	
# of Elderly Program Participants (>62)	0	0	947	109	0	109	0	0	
# of Disabled Families	0	0	793	332	0	326	0	0	

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
# of Families requesting accessibility features	0	0	3,548	1,132	0	1,120	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	978	476	0	466	0	0	0
Black/African American	0	0	2,537	649	0	647	0	0	0
Asian	0	0	8	1	0	1	0	0	0
American Indian/Alaska Native	0	0	25	6	0	6	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	529	385	0	377	0	0	0
Not Hispanic	0	0	3,019	747	0	743	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible. The public housing authority meets this standard.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

The need for larger units to accommodate large families is the focus for BMHA's future developments. Private development is not meeting this need and the housing authority has seen the growing trend. BMHA has seen a reduction in the number of large families applying for their housing programs, which they believe is due to the very long waiting listing for 4- and 5-bedroom units. BMHA has also seen large variations in rental costs, which is driving the concentration of poverty in certain communities. BMHA is considering mixed income development in the future to decrease this concentration and elevate communities where they have properties.

Housing Choice Voucher recipients are having difficulty finding units in desirable neighborhoods. Some landlords are not accepting voucher recipients despite New York State human rights law and City of Buffalo's fair housing law that include source of income as a protected class, meaning renters statewide who use Section 8 Housing Choice Vouchers, veterans' benefits, disability benefits, and other forms of non-wage income to pay rent will be able to live in the homes and neighborhoods they choose. Landlords are claiming units will not pass inspections and repairs would cause undue burdens.

How do these needs compare to the housing needs of the population at large

The need for safe housing in desirable areas reflects the needs of the City at large. Decent, safe, and affordable housing is a strong need for many low- and moderate-income households. The non-housing needs of public housing residents and Housing Choice Voucher holders – employment opportunities and transportation – also reflect those of the population at large, especially low- and moderate-income residents.

Discussion

BMHA has a total of 4,265 public housing units and 518 Housing Choice Vouchers plus another 5000 vouchers are administered by Renal Assistance Corporation in the City of Buffalo. BMHA notes the growing demand for larger units and has plans to address these needs with future developments.

NA-40 HOMELESS NEEDS ASSESSMENT – 91.205(C)

Introduction:

Homeless Alliance of Western New York (HAWNY) started as the Erie County Commission on Homelessness, created in 1992 by the Erie County Legislature to find ways to reduce homelessness in Erie County. In 2013, the Erie County CoC merged with the Niagara County CoC. On April 1, 2015, the larger CoC merged with the Orleans, Genesee and Wyoming Counties CoC. HAWNY is now the Continuum of Care Lead for Buffalo, Niagara Falls, Erie, Niagara, Orleans, Genesee and Wyoming Counties. HAWNY is also the Homeless Management Information System (HMIS) Lead for these communities and Cattaraugus County.

The Continuum of Care (CoC) program is designed to promote community-wide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

During the preparation of the Consolidated Plan, the country faced a pandemic, which disproportionately impacted low to moderate income people. The City of Buffalo's homeless population was greatly impacted and in response to social distancing guidelines, some homeless shelters are operating at reduced capacity, requiring a need for both increased funding for shelters, and increased shelter opportunities for the homeless. The COVID challenge has found new individuals reporting to homeless centers for food, access to services and shelter. There were 380 literally homeless individuals on the Rapid Rehousing By-Name waiting list prior to the COVID-19 pandemic, and the Homeless Alliance of Western New York counts approximately 649 individuals noted as homeless in the HMIS system as of 4/20/2020. Homeless Youth wait for housing as well. Over 100 people attend the Flickinger/Holy Cross shelters daily, and ECDSS has placed homeless individuals and families in hotels and motels throughout the region.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

In Erie County, on the night of the PIT count there were 662 people counted as experiencing homelessness. Of those 252 were families in a sheltered situation, 6 children only households in a sheltered situation, and 404 adult-only households of which 22 were unsheltered. Of the total number of people counted in Erie County, 8% (54) were veterans and only 2.4% (16) were chronically homeless.

Data in the chart below was completed using 2019 Point in Time data collected from HAWNY's website. Data is limited to what is collected for the annual Point in Time Count submitted to the Department of Housing and Urban Development. The data in the below chart includes all

jurisdictions served within the CoC, which includes Buffalo, Niagara Falls/Erie, Niagara, Orleans, Genesee, and Wyoming Counties.

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	373	0	n/a	n/a	n/a	n/a
Persons in Households with Only Children	11	0	n/a	n/a	n/a	n/a
Persons in Households with Only Adults	507	33	n/a	n/a	n/a	n/a
Chronically Homeless Individuals	28	3	n/a	n/a	n/a	n/a
Chronically Homeless Families	0	0	n/a	n/a	n/a	n/a
Veterans	73	1	n/a	n/a	n/a	n/a
Unaccompanied Child	52	2	n/a	n/a	n/a	n/a
Persons with HIV	5	1	n/a	n/a	n/a	n/a

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	373	14
Black or African American	436	16
Asian	3	0
American Indian or Alaska Native	8	2
Native Hawaiian or Other Pacific Islander	3	0
Multiple Races	68	1
Ethnicity:	Sheltered:	Unsheltered (optional)
Non-Hispanic/Non Latino	794	31
Hispanic/Latino	97	2

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

HAWNY conducted a survey, *Voices for 2020* with the expressed goal of developing a clearer picture of the physical, psychological, social, and resource needs of homeless families living in Erie, Niagara, Genesee, Orleans, and Wyoming Counties. The research team conducted focus groups with current and formerly homeless families as well as key informant interviews with local health and human service professionals, government representatives, funders, and other researchers to establish a preliminary understanding of the issues facing homeless families. The research team also completed an environmental scan and a profile of key programming needs, available resources, and gaps in service within these communities for use in strategic efforts. The report notes "one in ten families live below the federal poverty line. That percentage increases to just over 25% - or one in four - when the family includes minor children."

Researchers noted "despite high rates of poverty and underemployment among families living in Western New York, the community is extremely limited in its early identification and response systems especially as it relates to family homelessness." The number of homeless families in the area covered by the CoC has steadily increased over the past seven years from approximately 350 families reported in 2010 to the 653 reported in 2017 an 86% increase in the reported number. The majority of sheltered families (80%) were led by single mothers or female guardians, with head of household ages ranging from 16 to 71 years of age."

According to the *2017 Veteran Homelessness Summary Brief* 429 Veterans experienced homelessness in federal fiscal year 2017. Over 90% were males and nearly half (49.5 %) were African American. Ages of veterans ranged between 20-95 years old, but the greatest number between the ages of 50-59 years old.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

In September 2018, HAWNY published the report *Racial Disparities and Homelessness in Western New York*. In this report they analyzed racial disparities among homelessness within Western New York and examined the homeless system's equity serving different racial/ethnic groups in terms of receiving those services, prioritizing those services, and housing success rate. HAWNY notes:

Black people make up 11% of the general population of Western New York but they account for 25% of the people in poverty and 47% of the homeless population. When the number of people who experience homelessness are compared against the number of people who are in poverty, Black people living in poverty are 3 times more likely to experience homelessness compared to White people. These suggest that poverty rates alone do not explain the over-representation, but that systemic racism blunts the ability of people of color to recover from financial catastrophe to avoid homelessness relative to those who are White. (p. 2)

The Continuum of Care will work toward the goal of closing the racial wealth gap and foster a community of fairness, equity, and justice through using a racial equity lens in decisions, including policies, practices and programs.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Most homeless persons in Erie County are sheltered. There was a minimal decrease in the number of homeless individuals from 2018 (673 persons) to 2019 (662 persons) on the night of the Point in Time count. This can be attributed to continued work by homeless service providers to increase prevention and diversion efforts and quickly move households into permanent housing.

Discussion:

Homeless Alliance of Western New York (HAWNY) started as the Erie County Commission on Homelessness, created in 1992 by the Erie County Legislature to find ways to reduce homelessness in Erie County. The City of Buffalo continues to utilize federal funds to help address the needs of the homeless population in collaboration with the CoC.

NA-45 NON-HOMELESS SPECIAL NEEDS ASSESSMENT - 91.205 (B,D)

Introduction:

Persons with special needs include the elderly and frail elderly, persons with severe mental illness, persons with developmental disabilities, persons with physical disabilities, persons with alcohol/other drug addictions. In addition, many persons with such special needs also have very low incomes.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	3,255
Area incidence of AIDS	49.7
Rate per population	1.9
Number of new cases prior year (3 years of data)	59
Rate per population (3 years of data)	
Current HIV surveillance data:	
Number of Persons living with HIV (PLWH)	2,920
Area Prevalence (PLWH per population)	193.5
Number of new HIV cases reported last year	27

Table 26 – HOPWA Data

Data Source: CDC HIV Surveillance

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	n/a
Short-term Rent, Mortgage, and Utility	n/a
Facility Based Housing (Permanent, short-term or transitional)	n/a

Table 27 – HIV Housing Need

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Describe the characteristics of special needs populations in your community:

Persons with HIV/AIDS

HOPWA providers note within the City of Buffalo, there is an unaddressed need to reducing HIV transmission for individuals that engage in amphetamine use during intercourse. Much of the political focus is on opioid use but there has been an increase in HIV transmission as a result of amphetamine use during high-risk behaviors.

According to one HOPWA provider in the City of Buffalo one of the largest barriers their clients face is the lack of affordable housing in the community and the low Fair Market Rents (FMR). They state affordable housing is only available in areas that are further away from services or areas that are high in crime and unsafe for clients. During FY2018, there were 259 households served under the HOPWA Housing Subsidy Assistance program.

The City of Buffalo received additional CARES Act funds to address the needs of persons living with HIV/AIDS. The HOPWA COVID-19 STRMU (Short-Term Rent, Mortgage, and Utility Assistance) program will utilize HOPWA-CV funds to provide immediate rental subsidy assistance for persons living with HIV/AIDS, who have been affected by the COVID-19. A 24-month rental subsidy accompanied by case management will work to stabilize each client's housing and subsequent health related issues. The rental assistance and case management interventions will last 24 months.

Elderly

Elderly persons are more likely to live on fixed, very low incomes or require special supportive service to complete their daily routines. This means elderly residents especially need affordable housing options and easy access to service providers. For example, The University of Buffalo's 2014 community report on the City of Buffalo (West of Main Street) notes "Just over 5,200 seniors live alone [in the West Side], representing a population that is potentially at-risk and in need of human services, absent appropriate housing options and supports which are, in fact, relatively strong in this community."

According to ACS 2013-2017 estimates, 22% of households consist of at least one person aged 65 or over. In addition, the Census reported that 42% of persons 65 years and over had at least one disability in 2017; 19.1% of whom experienced an independent living difficulty and 8.2% experienced a self-care disability.

Persons with Disabilities

In 2017, 16.7% of the overall population had a disability. Individuals with ambulatory disabilities generally require accessible housing units, and individuals with independent living disabilities may require assisted living facilities. Data from the 2017 ACS indicates that 9.6% indicated an ambulatory difficulty; 7.40% reported a cognitive difficulty. The disability rate for persons 65 years of age and older is 42.9%.

In the City, 27.7% of all adults aged 18-64 live below the poverty line. However, there are differences in the incidence of poverty by disability status. For those with a disability, 47.4% live below the poverty line as compared to 24.1% of those without a disability.

Stakeholders note a shift in housing for persons with disabilities. The old model was institutional based and centered around medical services. In more recent years, this has shifted to be more of a community-based approach, where people with disabilities receive services and housing in neighborhoods of their choice.

Substance Abuse and Addiction

The University of Buffalo's 2014 community report on the City of Buffalo (East of Main Street) note "underpinning the battle with crime may be the prevalence of drug use and selling [...] Further fostering the drug trade is addiction. Residents from the Valley describe the problem as "huge" and say critical supports have been reduced or shut down."

In 2017, City of Buffalo created an Opiate Crisis Intervention Court program which is an iteration of the traditional drug court where an addicted nonviolent offender is channeled into recovery as an alternative to jail and a chance at a reduced sentence.

Individuals who have special needs are typically extremely low income and face tremendous challenges finding housing that they can afford. Individuals with special needs also require supportive services in addition to housing that they can afford. Public and private sources have limited funds available for these purposes, making it difficult for non-profit organizations to develop and operate housing and supportive service programs.

What are the housing and supportive service needs of these populations and how are these needs determined?

During stakeholder meetings, the need for affordable and accessible units was identified. Units should be located in areas near amenities and services. Providers discussed the need to look at housing and services from a holistic approach. Research has shown that housing is a social determinate of health and has lasting implications on wellbeing.

Providers discussed the need to review Universal Design standards, so that housing is built and or retrofit for anyone, regardless of ability. Housing should be located near accessible and reliable transit, especially for the elderly and persons with disabilities.

Supportive services should be tailored to the individuals needs and wrapped around that household in the community.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The City of Buffalo receives HOPWA funding from HUD. The 2018 New York State HIV/AIDS Surveillance Annual Report notes there are 2,526 persons living with diagnosed HIV in Buffalo. As of December 2018, there were 4,231 New Diagnoses of HIV and AIDS in Buffalo.

The City of Buffalo contracts with Evergreen Health Services, Inc. (EHS) to provide Housing assistance for individuals and families living with HIV/AIDS. HOPWA TBRA Program Overview: EHS provides long-term rental assistance (TBRA) and housing information services through this funding with the goal of reducing the risk of homelessness and enhancing efforts to identify, secure, and/or maintain stable living environments for individuals living with HIV/AIDS. Regular monthly rental assistance is provided to eligible individuals during the period between the time of application for Section VIII or other permanent rental assistance and when that assistance is awarded, or financial independence is realized.

Discussion:

As noted, the City of Buffalo partners with community-based organizations to provide services to special needs populations.

NA-50 NON-HOUSING COMMUNITY DEVELOPMENT NEEDS – 91.215 (F)

Describe the jurisdiction's need for Public Facilities:

Through CDBG funds, The City of Buffalo can fund the construction, rehabilitation, or installation of public facilities. Eligible public facilities include neighborhood facilities (such as educational centers, parks, recreation centers, and libraries) and facilities for special needs populations (such as homeless shelters, elderly facilities, or centers for people with disabilities).

During public needs meetings, participants identified the desire for recreational facilities for youth, parks, and community centers.

How were these needs determined?

The City of Buffalo facilitated a series of stakeholder interviews and public meetings and received feedback regarding the needs across the community. In addition, the City issues a Request for Applications from developers, nonprofits, and other community entities to internally determine needs and requests for the program year.

Describe the jurisdiction's need for Public Improvements:

Through CDBG funds, the City of Buffalo can also fund the construction, rehabilitation, or installation of public improvements. Public improvements include, but are not limited to, street and sidewalk improvements, water and sewer installation, and maintenance and ADA compliance construction and rehabilitation.

Stakeholders identified the need for improved infrastructure such as sidewalk improvements and beyond ADA compliant construction and rehabilitation. Stakeholders note the need for multimodal transportation and mixed-use development.

How were these needs determined?

The City of Buffalo facilitated a series of stakeholder interviews and public meetings and received feedback regarding the needs across the community. The City of Buffalo also utilizes internal measures from its Department of Public Works to determine needs.

Describe the jurisdiction's need for Public Services:

Through CDBG funds, The City of Buffalo can fund an array of public services. Eligible public services include, but are not limited to, homeless services, education and workforce development programs, homebuyer counseling, youth programming, elderly care and programs, and childcare and health services for low- moderate-income households.

Stakeholders note that homeless services such as street outreach and Rapid Rehousing are working well and should be maintained. There is a need to provide quality services to low income households, including at risk populations such as persons with substance use disorders, the elderly, and youth. These services should be aligned with social determinates of health and

should be spread across the community. All programs should be aligned with the City's goals and meet performance measures to show the impact they are having on the individual and community.

How were these needs determined?

The City of Buffalo facilitated a series of stakeholder interviews and public meetings and received feedback regarding the needs across the community. In addition, the City utilizes social determinates of health to determine needs for public services.

HOUSING MARKET ANALYSIS

MA-05 OVERVIEW

Housing Market Analysis Overview:

This market analysis identifies the need to preserve existing affordable housing opportunities while advancing efforts to create a diverse supply of additional affordable units. Ideally, the City of Buffalo will have a mix of housing types to accommodate households of all types and income levels. The City's housing strategies will be especially guided by the increasing mismatch between incomes and housing costs and the specific accommodations necessary to ensure that special needs populations have adequate affordable housing options with appropriate supportive services where needed. The City has established a goal of having 40% of the housing stock on the community be affordable.

General conclusions about the market, as described in the following pages, include:

- The housing stock in the City of Buffalo is principally multifamily (63%) and renter-occupied (63.6%).
- The Fair Market Rent (FMR) for a two-bedroom unit in the City of Buffalo is \$838 per month. To avoid being cost burdened, a household needs to earn \$2,793 per month, or roughly \$17.45 per hour.

MA-10 NUMBER OF HOUSING UNITS – 91.210(A)&(B)(2)

Introduction

The housing stock in the City of Buffalo is principally multifamily 2-4-unit properties (48%) and renter-occupied (63.6%). Data from the 2017 ACS indicates that, 27.7% of all adults aged 18-64 live below the poverty line. Among the entire population, 30.9% live below the poverty line. Among children under the age of 18 and seniors over the age of 65, approximately 47.2% and 16.8%, respectively, live below the poverty line. The high incidence of poverty among households with children and persons with disabilities points to the need for affordable housing, particularly within the renter-occupied market.

Of the nearly 45,000 owner-occupied units in the City, 79% consist of three or more bedrooms. Among renter-occupied units, there are approximately one third each, one-, two- and three-or more bedrooms. These data are consistent; single family units – which tend to be larger than multi-family units – comprise over 33% of the housing stock. There is a need for additional smaller multi-family housing units which tend to be more affordable, particularly for small families with children and single person households, demographic groups particularly prone to cost burden and severe cost burden.

The vacancy rate decreased from 18.9% in 2010 to 16.2% in 2017, according to ACS data.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	43,690	33%
1-unit, attached structure	3,730	3%
2-4 units	62,925	48%
5-19 units	9,250	7%
20 or more units	12,260	9%
Mobile Home, boat, RV, van, etc	280	0%
Total	132,135	100%

Table 28 – Residential Properties by Unit Number

Data 2011-2015 ACS
Source:

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	100	0%	2,335	4%
1 bedroom	1,390	3%	12,895	20%
2 bedrooms	8,075	18%	23,475	36%
3 or more bedrooms	36,310	79%	25,965	40%
Total	45,875	100%	64,670	100%

Table 29 – Unit Size by Tenure

Data 2011-2015 ACS
Source:

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Below lists just a few of the units assisted with federal, state, and local dollars to create affordable housing in the City of Buffalo.

Linwood Lafayette Senior Apartments – HOME funds were used to complete the construction of a new three-story apartment building consisting of thirty-seven (37) one- and two-bedroom units at both market rate and low-income rents. Ten (10) units were designated as HOME assisted.

Elim Townhomes –HOME funds were used for the construction of thirty (30) new townhome style apartment units that will include thirteen (13) three-bedroom units and four (4) four-bedroom units. The project will yield eleven (11) HOME assisted units.

Jefferson Avenue Apartments funds were used for the completion of newly constructed apartment complex on a brownfield cleanup site. The project will consist of a total of ninety (90) affordable units located in two (2) buildings specifically forty three (43) one bedroom units and eleven (11) two bedroom units located in 1140 Jefferson and twenty-eight (28) one bedroom units and eight (8) two bedroom units located in 1166 Jefferson Avenue. The project will yield eleven (11) HOME assisted units.

Kensington Avenue was a rehabbed flower shop that created (3) three –bedroom apartments. The (3) three-bedroom apartments have all been designated as HOME assisted units. All units will be marketed and rented to households with incomes below 80% of the AMI following initial occupancy.

Lofts at University Heights includes twenty-eight (28) one-bedroom units and sixteen (16) two-bedroom units. Eight of the units have been designated as HOME assisted.

School 77 includes thirty (30) affordable units of housing. Ten (10) units have been designated as HOME assisted and all units will be available for rental by low income households with incomes below 80% of the AMI following initial occupancy.

AP Lofts at Larkinvillle includes one hundred and forty-seven (147) units of affordable rental housing. The structure will include eighty-four (84) one-bedroom units and sixty-three (63) two-bedroom units. Seven (7) units have been designated as HOME assisted units and will be available for low income households with incomes below 80% of the AMI following initial occupancy.

769 Best Street – Park View Apartments created a total of twenty-six (26) rental units for low income individuals, seven (7) of which were designated as HOME Assisted Units.

240 Niagara Street includes forty-eight (48) newly constructed townhouse style apartments, of which four (4) are HOME assisted units.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

HUD's multifamily/Section 8 contract database the following properties will expire in the next 5 years: Dymphna Project (non-profit); Pilgrim Village (profit motivated); West Side Residents (non-profit) and Burnie C. McCarley Gardens (non-profit).

Does the availability of housing units meet the needs of the population?

As mentioned in the Needs Assessment, 16.6% of City households are cost burdened and 22.7% of households are severely cost burdened. The vacancy rate is over 16%. The largest need is for rehabilitation of existing homes, revitalization of area specific neighborhoods, and financial assistance for low to moderate income residents. In the 2014 publication *Complete Communities for a Changing Region*, researchers note “ The condition of housing also continues to deteriorate, not only in the City of Buffalo but in the suburbs where the number of vacant homes increased [...] Unlike many other regions, a high instance of housing vacancy stems from long-term depopulation and decentralization away from the urban core, not private mortgage foreclosure.”

In the 2017 publication *Buffalo Housing Opportunity Strategy* the overarching goal was the stark contrast in housing quality and inventory based on where you live in the City. Past deferred investment in sections of the City have created concentrated areas of low quality, substandard housing. These tend to be in the lower income, higher minority populated areas of the community. While reinvestment in other parts of the City have increased rent and housing costs for those areas, further dividing the community. These higher demand areas are located in the sections of the City with no racial concentration.

BMHA reports having over 3300 people on the waiting list for project-based housing. As mentioned in earlier sections the need for larger 4- and 5- bedroom units have increased according to BMHA. Other stakeholders echoed this need and also reported a need for increased SROs for homeless single adults.

Describe the need for specific types of housing:

Housing needs vary across the City of Buffalo depending on the area. This was highlighted by stakeholders and in the *Buffalo Housing Opportunity Strategy* report. The City of Buffalo has vastly different housing markets depending on the community you are in. Strategies and suggestions for housing in these distinct areas are outlined in the *Buffalo Housing Opportunity Strategy* report. While in some neighborhoods such as Elmwood Avenue and Delaware Park, there is a need to expand affordable housing options so that low income residents can move to this highly desirable community. In areas such as the Upper West Side and University Heights there is a need for scattered site infill and more affordable housing options. In Moderate and Lower Demand areas some demolition and home rehab are needed.

MA-15 HOUSING MARKET ANALYSIS: COST OF HOUSING - 91.210(A)

Introduction

The HUD-provided table below indicates the number of affordable units available to households with various income levels. The 7,470 rental units identified as affordable to households below 30% of the HUD-adjusted Median Family Income (HAMFI) represent only 5.4% of the rental housing inventory in the City. Given that CHAS data indicates there are 30,825 households with incomes below 30% of HAMFI, there are more than four households that need affordable housing at this income level for every affordable unit available, representing a clear and demanding need for additional affordable housing solutions.

The Fair Market Rent (FMR) for a two-bedroom unit in the City of Buffalo is \$838 per month. To avoid being cost burdened, a household needs to earn \$2,793 per month, or roughly \$17.45 per hour. A minimum wage worker in New York earning \$11.80 per hour needs to work in excess of 59 hours per week to afford a two-bedroom unit. The monthly Supplemental Security Income (SSI) payment is \$771. Households for which this is the sole source of income can spend \$231 monthly on housing, which is less than a third of the cost of renting a one-bedroom unit.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	65,200	68,800	6%
Median Contract Rent	453	538	19%

Table 30 – Cost of Housing

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	27,630	42.7%
\$500-999	33,500	51.8%
\$1,000-1,499	2,645	4.1%
\$1,500-1,999	720	1.1%
\$2,000 or more	180	0.3%
Total	64,675	100.0%

Table 31 - Rent Paid

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	7,470	No Data
50% HAMFI	28,380	10,145
80% HAMFI	47,405	18,925
100% HAMFI	No Data	24,024
Total	83,255	53,094

Table 32 – Housing Affordability

Data 2011-2015 CHAS
Source:

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	671	695	838	1,050	1,204
High HOME Rent	671	695	838	1,050	1,204
Low HOME Rent	671	695	838	1,000	1,116

Table 33 – Monthly Rent

Data HUD FMR and HOME Rents
Source:

Is there sufficient housing for households at all income levels?

CHAS data indicates there are 30,825 households with incomes below 30% of HAMFI, there are more than four households that need affordable housing at this income level for every affordable unit available, representing a clear and demanding need for additional affordable housing units. There are 28,380 rental units available to households earning 50% of HAMFI and 10,940 total renter households in this income level.

Twenty-eight (28%) of the City of Buffalo's residents earn 0-30% of area median income. With nearly a third of all residents in the extremely low-income bracket, there is a lack of sufficient affordable housing to meet the total demand.

How is affordability of housing likely to change considering changes to home values and/or rents?

One Region Forward's *A New Way to Plan for Buffalo Niagara* notes a desire to contain urban sprawl that was pervasive in the 1970s. Buffalo has become more car centric and people are driving further to get to jobs. The oldest neighborhoods and housing in the urban areas lost population which has caused an increase in the number of vacant homes in the area. The report also notes a strong desire to preserve, revitalize and re-purpose existing places rather than create new, build walkable communities, diversify transportation options and protect open space and other natural areas.

Due to the considerable differences among neighborhoods in the City of Buffalo, there will be varying changes to housing affordability. Home prices and rents may continue to increase in neighborhoods that are already high markets, while lower markets may continue to see lower costs, but subpar housing. The City of Buffalo's *Buffalo Housing Options Strategy* report analyzed 50 neighborhood level markets and found that only 13 are "truly competitive." The study shows that poverty is the main driving force behind unaffordability, not high housing costs.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

HOME rents and FMR rents are exactly the same across all unit types within the City of Buffalo. This is likely due to the low-income level of the residents in the City of Buffalo. The maximum HOME rents are the lesser of: a) The fair market rent for existing housing for comparable units in the area; or b) A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the median income for the area.

MA-20 HOUSING MARKET ANALYSIS: CONDITION OF HOUSING – 91.210(A)

Introduction

The housing conditions in the City of Buffalo vary depending on their location. Exterior conditions of homes in lower income, low demand neighborhoods have high levels of substandard conditions and blight. According to *Buffalo Housing Options Strategies* report which evaluated 70,000 properties reported:

The scale of disinvestment and deferred maintenance revealed by the survey of exterior conditions—including 2,000 properties showed severe blight, 14,500 with moderate signs of distress and 37,500 signaling neither distress nor obvious recent investments. (p. 28)

Definitions

Standard Condition: No major structural defects; adequate plumbing and kitchen facilities; appearance which does not create a blighting influence; and the house meets additional, more stringent, local standards and building codes, including lead-based paint clearance.

Substandard Condition but Suitable for Rehabilitation: The nature of the substandard condition makes rehabilitation both financially and structurally feasible.

Housing Conditions: Condition of units is assessed using the same criteria as in the Needs Assessment. This includes: 1) lacks complete plumbing facilities, 2) lacks complete kitchen facilities, 3) more than one person per room, 4) cost burden (amount of income allocated to housing) is greater than 30%, and 5) complies with applicable building code standards.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	10,375	23%	31,720	49%
With two selected Conditions	330	1%	1,800	3%
With three selected Conditions	65	0%	250	0%
With four selected Conditions	0	0%	20	0%
No selected Conditions	35,115	77%	30,875	48%
Total	45,885	101%	64,665	100%

Table 34 - Condition of Units

Data 2011-2015 ACS
Source:

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	710	2%	1,805	3%
1980-1999	1,820	4%	3,745	6%
1950-1979	7,160	16%	14,560	23%

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Before 1950	36,185	79%	44,560	69%
Total	45,875	101%	64,670	101%

Table 35 – Year Unit Built

Data 2011-2015 CHAS
Source:

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	43,345	94%	59,120	91%
Housing Units build before 1980 with children present	1,480	3%	290	0%

Table 36 – Risk of Lead-Based Paint

Data 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)
Source:

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 37 - Vacant Units

The above table populates null from IDIS. There is no local data for this information.

Need for Owner and Rental Rehabilitation

Older housing typically requires more continual maintenance. In the absence of routine maintenance, older housing can quickly become substandard. A common age threshold used to signal a potential deficiency is approximately 50 years or more. Seventy-three percent (73 %) of the housing units in the City were built prior to 1950. Another 19.6% of all units were built between 1950 and 1979.

Owner- and renter-occupied housing units have different percentages of units built in the four time periods presented in the table above. Although both owner and rental units likely require rehabilitation from normal wear and tear, the need is slightly greater for owner units – 79% were built prior to 1950, compared to 69% for renter occupied units. However, the market has significantly more owner units in than rental units.

Renter-occupied units have a much higher prevalence (49%) of having at least one selected condition than owner-occupied units (23%). "Selected condition" includes cost burden and overcrowding, which are not reflections of the physical state of the unit.

Stakeholders mention the City has responded to blight by demolishing deteriorated housing. This has created changes in neighborhood character, and many would like to see greater effort to rehabilitate and preserve housing.

Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards

Lead-based paint was banned from residential uses in 1978. All houses constructed before 1978 are therefore considered at risk for containing lead-based paint. HUD has made the elimination of housing units containing lead-based paint a priority. The poisoning of children from contact with lead-based paint has been recognized as a major public health problem by the Center for Disease Control (CDC). According to the CDC, lead is the number one environmental health hazard to American children. It is estimated that 10%-15% of all preschoolers in the United States are affected. Lead poisoning causes IQ reductions, reading and learning disabilities, decreased attention span, hyperactivity, and aggressive behavior.

Lead-based paint hazards pose the greatest risk for children, especially those under seven years of age. The HUD IDIS-generated table above provides data on owner-occupied and renter-occupied units built before 1980 with children present. As the table indicates, children in the County's owner-occupied units are much more likely to be impacted by lead-based paint hazards than children in owner-occupied units.

The Erie County Department of Health notes nine of the county's zip codes, predominately in the City of Buffalo: 14201, 14207, 14208, 14209, 14210, 14211, 14212, 14213, and 14215, have been designated by the New York State Department of Health as "Communities of Concern" where children are at exceptionally high risk for lead poisoning.

MA-25 PUBLIC AND ASSISTED HOUSING – 91.210(B)

Introduction

Assisted rental housing includes public housing units owned and operated by the BMHA, units rented through the Housing Choice Voucher Program, units rented through the Section 8 tenant-based voucher system, and other units assisted by local, state, or federally funded programs. Information was obtained through review of BMHA documents and surveys and interviews with BMHA representatives and other entities that administer Housing Choice Voucher tenant-based vouchers in the City. This information reflects public housing needs, the condition of units, restoration and revitalization needs, waiting list data, and Section 504 Needs Assessment status.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			4,213	1,372			0	0	0
# of accessible units			66						
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 38 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

According to BMHA's 2019 Annual Agency Plan BMHA has a total of 4,265 public housing units. These units are located across the City of Buffalo.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

BMHA has undertaken significant initiatives, rehabilitation projects, parking lot repairs, playground equipment repairs/replacements, and many other upgrades and systems replacements at various developments in last year. While some projects remain ongoing, others have reached completion or substantial completion. These actions will hopefully contribute to improved resident satisfaction and move closer toward improving the overall quality of life for residents of the BMHA.

Public Housing Condition (Inspection Scores)

Public Housing Development	Average Inspection Score
SHAFFER VILLAGE & LASALLE COURTS 134 Isabelle St	52
HOLLING HOMES, CAMDEN & ELMHURST 74 Holling Dr	58
JASPER PARRISH PLACE 226A Lawn Ave	52
COMM. PERRY EXT. HR., SLATER & MULLEN 344 Perry St	52
COMM. PERRY HOMES & EXT. ROWHOUSES 433 Perry St Apt	61
FD FED, REDWOOD, WOODSON & SSC 515 Clinton St	57
KENFIELD HOMES 326 Edison Ave	55
LANGFIELD HOMES 103A Langfield Dr	41
FERRY-GRIDER 961 E Ferry St Apt W	70
SCHWAB, KOWAL & MSGR. GEARY APTS. 1250 Bailey Ave	67
KELLY GARDENS & LYNDON B. JOHNSON APTS. 167 W Humboldt Pkwy	80
SEDLIT & STUYVESANT APTS. 245 Elmwood Ave	50
LOWER WEST SIDE HOMES 167 10th St	58
Lakeview on the Park 345 Trenton Ave	94
Lakeview Family Homes 2000 390 Trenton Ave Apt	84
A.D. Price - Phase I 15 Mortimer St Apt	61
AD Price Phase II 450 Jefferson Ave	63
Walden Park 101 Bakos Blvd	86
Hertel Park 1631 Hertel Ave	98
AD Price III 34 Mortimer St Apt	96
MISSING 368 Broadway St Apt	73

Table 39 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Price Courts (AMP 23) -- Currently, a Disposition Subpart F Application is under review with the Special Applications Center (SAC) for A. D. Price Courts. After several meetings with residents

and neighborhood stakeholders, a revitalization plan has been completed and approved by the Board of Commissioners in 2016. A 9% low income housing tax credit application has been submitted to New York State. The plan calls for demolition of 9 of 10 buildings.

Commodore Perry Homes (AMP 21) – In order to prepare the development site as a shovel ready site, a demolition application will be submitted to the Special Application Center (SAC) following obsolescence justification of the demolition regulations. This is the implementation of the comprehensive Choice Neighborhood Transformation Plan prepared by the BMHA and approved by HUD in 2015.

Lakeview on the Park (AMP 21) and Lakeview Family Homes (AMP 42) will be disposed of under the Rental Assistance Demonstration PBRA Conversion. The number of units and the type of units will remain the same after conversion.

The Buffalo Municipal Housing Authority (BMHA) has received a multi-phase RAD Commitment for Housing Assistance Payment (CHAP) for 172 units of the 414 units in the Commodore Perry Homes (AMP 21). The BMHA has successfully converted 46 units through a Transfer of Assistance to the Frederick Douglass Phase I affordable housing development. The remaining 126 units will be converted to Project Based Voucher in the Perry Choice Neighborhood. The unit composition and designation has not yet been determined. Efforts will be made to replace the same number of units and designation.

BMHA anticipates submitting an application for the conversion to Project Based Vouchers the following developments: Shaffer Village Development (AMP 10) 233 Units – As part of a redevelopment effort, the BMHA will be applying to convert all of the units to Project Based Voucher (PVB) under the RAD program. The redevelopment will work to replace all of the current units with newly constructed units. The conversion will target Low Income Tax Credit, NYS Public Housing Preservation Funds and permanent debt through the issuance of tax-exempt bonds by NYS Housing Finance Agency.

Lyndon B. Johnson (AMP 34) 206 Units – Conversion to Project Based Voucher through a renovation program which will leverage Low Income Tax Credit and NYS State Public Housing Preservation funds and permanent debt through the issuance of tax-exempt bonds by NYS Housing Finance Agency.

Buffalo Municipal Housing Authority will be converting Lakeview on the Park (NY002000041) and Lakeview Family Homes (NY002000042) to Project Based Rental Assistance under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to Project Based Rental Assistance the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.7 of PIH Notice 2012-32, REV-2; and Joint Housing PIH Notice H-2014-09/PIH-2014-17.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

BMHA is committed to making improvements to the properties in their portfolio demonstrated in

their annual action plan. Rental Assistance Corp. of Buffalo administers a Family Self Sufficiency (FSS) program to encourage clients to become more self-sufficient. The FSS program is designed to provide supportive services and tools to assist clients obtain economic and housing self-sufficiency. At enrollment, the FSS participants signs a five (5) year agreement and establishes goals which will help them obtain self-sufficiency. The FSS program provides a savings opportunity for residents known as an escrow account. Deposits are made into the client's escrow account when the FSS participant's earned income increases and the amount of Housing Assistance decreases. Participants must successfully achieve established goals in order to be eligible to receive escrow funds upon completion of the FSS program. FSS participants may also utilize a portion of their funds for necessary expenses which are related to obtaining their goals.

MA-30 HOMELESS FACILITIES AND SERVICES – 91.210(C)

Introduction

Data in the chart below was completed using 2019 Housing Inventory Chart (HIC) data collected from HAWNY's website. Data is limited to what is collected for the annual Point in Time Count submitted to the Department of Housing and Urban Development. The data in the below chart includes all jurisdictions served within the CoC.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	325	94	112	81	n/a
Households with Only Adults	325	0	166	1127	n/a
Chronically Homeless Households	0	0	0	662	n/a
Veterans	18	0	34	297	n/a
Unaccompanied Youth	0	0	23	0	n/a

Table 40 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The HAWNY operates programs using the Housing First approach. There are several key features in this approach of which includes the voluntary engagement in supportive services, and a focus on housing stability. All program types under the CoC's Written Standards provide voluntary services including case management, assist the household with connections to resources that help them improve their safety and well-being and achieve their long-term goals. This includes providing or ensuring that the household has access to resources related to benefits, employment and community-based services (if needed/appropriate) so that they can secure permanent housing.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Permanent Supportive Housing (PSH) for persons with disabilities is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist persons experiencing homelessness with a disability or families with an adult or child member with a disability achieve housing stability. HAWNY has a set of minimum standards of assistance which include:

- There can be no predetermined length of stay for a PSH project
- Supportive services designed to meet the needs of the project participants must be made available to the project participants throughout the duration of stay in PSH
- Project participants in PSH must enter a lease (or sublease) agreement for an initial term of at least one year that is renewable and is terminable only for cause. Leases (or subleases) must be renewable for a minimum term of one month.
- PSH programs must utilize housing first approaches.

Rapid Rehousing is an intervention designed to help individuals and families exit homelessness quickly by returning to permanent housing without preconditions (including, but not limited to, sobriety, employment, absence of a criminal record, or income). Additionally, the resources and services provided are tailored to the unique needs of the household receiving assistance.

In response to social distancing guidelines enforced due to COVID-19, some homeless shelters are operating at reduced capacity, requiring a need for both increased funding for shelters, and increased shelter opportunities for the homeless. The COVID challenge has found new individuals reporting to homeless centers for food, access to services and shelter. There were 380 literally homeless individuals on the Rapid Rehousing By-Name waiting list prior to the COVID-19 pandemic, and the Homeless Alliance of Western New York counts approximately 649 individuals noted as homeless in the HMIS system as of 4/20/2020. Homeless Youth wait for housing as well. Over 100 people attend the Flickinger/Holy Cross shelters daily, and Erie County Department of Social Services has placed homeless individuals and families in hotels and motels throughout the region. Once the stay at home and other "PAUSE" guidelines and use of CARES

Act restrictions are lifted, the City will be overrun with the housing needs of low to moderate income individuals. Low income and homeless individuals are facing food insecurity, and with many soup kitchens closed, some individuals are turning to emergency homeless shelters for meals and personal care needs.

MA-35 SPECIAL NEEDS FACILITIES AND SERVICES – 91.210(D)

Introduction

Special needs populations include, but are not limited to, persons who are mentally ill, mentally disabled, physically disabled, are substance abusers/addicts, have AIDS, are homeless, and are elderly and in need of supportive housing. While people with special needs live in all parts of the community, many of the supportive resources are located in the City of Buffalo.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Elderly and Frail

For seniors, housing maintenance was identified as a key issue. The housing stock in Buffalo is old and deteriorating. Many of the City's elderly residents are on fixed income and are unable to afford repairs to keep their home in good condition.

Many non-profit organizations and community centers provide services to the elderly such as transportation, social activities, fitness classes, and case management. There are also many senior living options available, and this demand is likely to increase with the aging population. The City will continue to consider proposals to use HOME funding for senior housing.

Multiple agencies mentioned the need for more transportation options. Many seniors are unable to drive anymore and require public transportation that is often not frequent or reliable enough (especially in the winter). There are many agencies that offer transportation services, yet the current amount is still inadequate to meet demand.

Persons with Mental, Physical, and/or Other Developmental Disabilities

A lack of affordable and accessible housing options can often be one of the reasons that individuals with mental health or developmental health disabilities experience high rates of accessing various social service systems.

Services for persons with mental disabilities are provided by a mixture of private, public, and non-profit institutions. The majority of public institutions are funded by the state or county. Mental health providers often also offer substance abuse services, and most providers serve both children and adults.

Housing that is accessible to all disability types and located in areas that are safe, transit oriented, and close to supportive services was a major issue noted by stakeholders.

Victims of Domestic Violence, Dating Violence, Sexual Assault and Stalking

In 2018 the City of Buffalo Police Department reported 3,500 domestic violence crime victims. Child and Family Services operates Haven House, a fully inclusive, safe, and secure emergency shelter in a confidential location to help survivors of domestic violence escape their abusers. In their 2018-2019 Annual Report, Haven House served 363 children, women and men in the emergency shelter.

Most existing services address advocacy, education, and linking victims with school and financial services. Housing, transportation, and legal assistance are inadequate. Housing is the

most important need for domestic violence victims, who need to get into a safe and secure housing situation away from their abuser.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The Continuum of Care, which serves individuals and families experiencing homelessness has outlined discharge planning practices for several health and non-health institutions.

Foster Care

The discharge plan for foster care is being implemented successfully with the Erie County Continuum of Care. Foster care case managers at the Erie County Department of Social Services (ECDSS) create and carry out individual plans for each youth leaving the foster care system, which includes a housing plan. This discharge plan is based on state legislation which requires any child leaving foster care to be placed into appropriate housing, which includes apartments, small boarding homes, and housing with friends or family; but not a shelter, single room occupancy, or congregant living with more than 10 individuals.

Health Care

The discharge plan for health care systems is being implemented successfully with the Erie County Continuum of Care. According to the state Patient's Bill of Rights, hospitals are required to provide all patients with written discharge plans, which patients have to agree to prior to being discharged. Discharge planners provide assistance in linking those persons who require placement into inpatient and residential settings, such as nursing homes, rehab facilities, alcohol and substance abuse, and mental health treatment. These practices are effective for ensuring proper placement of individuals into permanent housing and treatment or care facilities.

Mental Health

State Office of Mental Health governs the release of patients from state mental health facilities. These regulations mandate that discharge plans include the provision of housing consistent with the level of care required by the patient and ensure that patients are not approved for release until they have a comprehensive discharge plan in place. The Erie County Department of Mental Health implements these regulations through a Single Point of Access system for available beds and Transitional Case Managers. Individuals are identified while in the facility and referred to Transitional Case Managers or through the SPOA Coordinator. The case manager is then responsible for coordinating housing, income, health, and behavioral health services upon discharge with the assistance of the psychiatric facility discharge planner.

Corrections

Approximately 45 to 60 days prior to an inmate's release, the State Division of Parole initiates the discharge planning process from state correctional facilities. Housing, specialized treatment needs, and employment are the highest priority goals addressed in the discharge planning process. The Division of Juvenile Justice and Opportunities for Youth has established a policy preventing the release of youth from its facilities into homeless shelters. Despite this process, there are a high percentage of former inmates who become homeless shortly after discharge from correctional facilities.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City of Buffalo continues to operate programs to assist low income households in the community address housing and supportive service needs. Under the CDBG program, the City aids with emergency repairs to single family and multifamily owners. This program is often the only option available to low income, disabled, and elderly homeowners. This program is responsible for helping the most vulnerable residents stay in their homes. The program keeps homes owner occupied. Many residents would likely abandon their homes if this funding was not available.

The City provides Homebuyer Assistance in the form of deferred loans to eligible households who agreed to purchase and occupy homes in the City of Buffalo. The funding assistance is for up to \$5,000 for eligible down payment and closing costs assistance and the period of affordability is 5 years.

The City also provides weatherization assistance to low income households. This program reduces energy costs for low-income households by increasing the energy efficiency of homes, while ensuring health and safety. The program provides repairs and improvements to home heating systems and provides for the installation of energy-saving measures in the house, such as insulation and air sealing.

The City of Buffalo Department of Community Services administers the HOPWA and Emergency Solutions grant. The Department of Community Services also administers CDBG grant and the Emergency Solutions Grant for agencies throughout the City. This collaborative and coordinated process provides an improved opportunity for not only assessing mainstream resources, but also helps improve quality of life by having the ability to link HOPWA clients to existing community-based job training childcare, senior citizen, and fair housing agencies. Outreach and support services to and for HIV/AIDS clients can be found through reestablished relationships with the Homeless Alliance of Western New York, the Western New York Coalition for the Homeless /Housing Opportunities Made Equal, Neighborhood Legal Services and Legal Aid Buffalo, and through the Belmont Housing Resources and the City's network of Community Housing Development Organizations.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The City of Buffalo is committed to providing housing and services to non-homeless special needs populations. In 2020, the City will utilize federal resources to provide public services that improve economic stability, education, social and community, health and health care and neighborhood and building environments.

Negative Effects of Public Policies on Affordable Housing and Residential Investment

According to the most recent Analysis of Impediments to Fair Housing Choice (AI), public policies were reviewed to assess potential negative impacts on affordable housing. The AI notes, the City of Buffalo's 2014 Land Use Plan is an update to the land use section of the comprehensive plan and set the foundation for the adoption of the Buffalo Green Code. The plan calls for encouraging infill development and redevelopment around existing employment nodes, mitigating blight and preserving neighborhood integrity. The plan calls for greater flexibility in development regulations to encourage new development in targeted areas, higher densities in areas served by existing infrastructure, and supporting transit and alternative transportation modes for residents. This is embodied in the goal to keep housing and transportation costs to less than 45 percent of income for residents. The goals identified in the land use plan provided the framework for the creation of the Buffalo Green Code where policies and regulations were revised to achieve community goals.

The Buffalo Green Code outlines new zoning, which allows for mixed uses, including residential uses in proximity to employment centers and mixed-use development commercial and retail development can support lower cost residential options. Additionally, lot sizes across districts are reasonable and do not add an undue burden on new development. Group homes and halfway houses are explicitly recognized and allowed where appropriate, along with emergency shelters and similar facilities.

The City of Buffalo recognizes equal and unimpeded access to residential housing is a fundamental civil right that enables members of protected classes, as defined in the federal Fair Housing Act, to pursue personal, educational, employment, or other goals. The City is committed to furthering the federal Fair Housing Act, State and Local fair housing ordinance.

MA-45 NON-HOUSING COMMUNITY DEVELOPMENT ASSETS – 91.215 (F)

Introduction

The largest number of workers who live in the City, according to the Business Activity table below, are employed in the Education and Health Care Services, Arts, Entertainment, Accommodations, and Retail and Trade sectors.

According to the data by occupation, the Sales and Office sector is the largest, with 33% of City residents working in this sector. This is consistent with the types of employment opportunities available for City residents.

Economic Development Market Analysis

The following HUD-generated tables contain data pertinent to economic development in the City of Buffalo. Discussion and analysis of the data follows the Educational Attainment table.

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	105	15	0	0	0
Arts, Entertainment, Accommodations	11,872	13,641	15	12	-2
Construction	2,261	3,382	3	3	0
Education and Health Care Services	18,175	28,294	22	25	3
Finance, Insurance, and Real Estate	5,736	9,830	7	9	2
Information	1,525	3,465	2	3	1
Manufacturing	6,896	9,839	8	9	0
Other Services	4,078	5,562	5	5	0
Professional, Scientific, Management Services	7,410	17,519	9	15	6
Public Administration	0	0	0	0	0
Retail Trade	9,859	7,531	12	7	-5
Transportation and Warehousing	3,203	3,654	4	3	-1
Wholesale Trade	3,195	3,921	4	3	0
Total	74,315	106,653	--	--	--

Table 41 - Business Activity

Data 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)
Source:

Labor Force

Total Population in the Civilian Labor Force	122,490
Civilian Employed Population 16 years and over	108,740
Unemployment Rate	11.22
Unemployment Rate for Ages 16-24	25.57
Unemployment Rate for Ages 25-65	6.86

Table 42 - Labor Force

Data 2011-2015 ACS
Source:

Occupations by Sector	Number of People
Management, business and financial	21,225
Farming, fisheries and forestry occupations	5,065
Service	15,050
Sales and office	26,325
Construction, extraction, maintenance and repair	5,555
Production, transportation and material moving	6,035

Table 43 – Occupations by Sector

Data 2011-2015 ACS
Source:

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	80,620	78%
30-59 Minutes	18,055	17%
60 or More Minutes	4,745	5%
Total	103,420	100%

Table 44 - Travel Time

Data 2011-2015 ACS
Source:

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	7,655	1,735	10,595
High school graduate (includes equivalency)	20,130	2,745	12,520
Some college or Associate's degree	28,865	3,270	12,220
Bachelor's degree or higher	28,640	1,510	5,105

Table 45 - Educational Attainment by Employment Status

Data 2011-2015 ACS
Source:

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	595	1,110	1,590	2,910	4,005
9th to 12th grade, no diploma	4,795	4,360	2,930	7,080	4,725
High school graduate, GED, or alternative	9,450	8,825	7,800	18,800	10,065
Some college, no degree	13,460	9,975	6,550	13,890	4,890
Associate's degree	1,680	4,190	3,270	6,500	1,550
Bachelor's degree	3,945	8,685	3,670	7,425	2,440

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Graduate or professional degree	420	5,655	3,755	6,080	3,020

Table 46 - Educational Attainment by Age

Data 2011-2015 ACS
Source:

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	16,867
High school graduate (includes equivalency)	25,402
Some college or Associate's degree	28,207
Bachelor's degree	38,986
Graduate or professional degree	50,632

Table 47 – Median Earnings in the Past 12 Months

Data 2011-2015 ACS
Source:

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

According to the Bureau of Labor Market Information's 2019 *Significant Industries A Report to the Workforce Development System* for Western New York, Twelve industries are designated as "significant" in Western New York. The Western New York region includes Allegany, Cattaraugus, Chautauqua, Erie and Niagara counties.

Ten of these industries experienced an increase in employment between 2013 and 2018. Skilled trade contractors were the top significant industry in the region, followed by fabricated metal production manufacturing, computer and electronic product manufacturing and transportation equipment manufacturing.

According to Buffalo Niagara's Strategic Plan for Prosperity 2017, Buffalo Niagara produced \$56.5B in goods and services in 2015, ranking the region in the top 15%, generally equal to the population, of all metros across the U.S. And, with exports from the region valued at \$7.11B, Buffalo Niagara is becoming more global than ever before. Today Buffalo Niagara is home to international companies, which include General Motors, FedEx, Geico, IBM, Delaware North, New Era, Moog, Rich Products, Tesla Solar, Praxair, Ford, Astronics, General Mills, and Yahoo.

Many of the listed companies are in the manufacturing sector, which according to the charts above is one of the area's top sectors. The region invested heavily in both health care and life sciences, especially in the Buffalo Niagara Medical Campus in an effort to co-locate clinical and research & development functions that will foster greater knowledge exchange and collaboration among organizations and professionals.

Describe the workforce and infrastructure needs of the business community:

There are a number of workforce development programs in the City of Buffalo, however stakeholders note the need to have jobs and training programs that help residents increase their income at or above a living wage. In the *Buffalo Housing Opportunity Strategy* report, poverty was the number one reason for the affordability problem. Researchers reviewed U.S Census data from 2009 to 2011 and found that one in five African American households in Buffalo dealt with unemployment. This racial divide in employment and economic opportunity continues to perpetuate residential segregation in the community.

There is a need for thoughtfully designed communities within Buffalo that have mixed use and mixed income. This would require the leveraging of public and private resources to stimulate mixed development.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Buffalo Film Works is building out a major motion picture film studio in the Seneca Babcock neighborhood of the City of Buffalo by rehabbing vacant former manufacturing facilities and repurposing them into world-class sound stages for major motion pictures and television series productions. This project, the first of its kind in the region, will continue to attract productions to WNY—creating hundreds of jobs locally, bringing an influx of outside spending, and highlighting our natural, historic and architectural assets through film

Located in the Lovejoy neighborhood of the City of Buffalo, Sound Wellness will redevelop an existing building into an onsite lab and industrial hemp processing and manufacturing facility. Sound Wellness will process industrial hemp and use it to manufacture dietary supplements and other consumer goods in compliance with FDA standards. The project will be the first NYS location operating under a high-level Good Manufacturing Practices certification and will create 29- FTE positions, ranging from entry through management levels.

On February 20, 2020 Mayor Brown delivered the State of the City Address. The Mayor presented an approach to economic development and job creations “Buffalo’s Race for Place.” This initiative will foster dynamic public-private partnerships to foster the next wave of growth. The Mayor also commented funding over the next five years to close the racial wealth gap and foster a community of fairness, equity, and justice. These two approaches will align economic development, housing and public services to address the needs of Buffalo residents.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

A new workforce development fund was created to ensure the pipeline for workforce is keeping up with industry demands. The fund is designed to promote and invest in innovative approaches to workforce training for underserved populations. The fund will help scale up organizations doing high-impact, results-oriented workforce training with strong results in training, job

placement and retention. The fund will facilitate partnerships with community and neighborhood-based organizations with proven track records, trust and outstanding abilities for outreach and recruitment. It will also support target sectors ripe for growth in jobs and career ladder opportunities for entry-level and mid-skill workers, while funding best practice models that maximize collaboration between industry, employers and workforce trainers. According to the 2019 Western New York Progress Report Workforce Development Challenge (WDC) funded six regional projects in 2018 ensuring the region's workforce pipeline is being responsive to industry demand in fields like healthcare and renewable energy, while targeting underserved populations.

Programs such as The Kitchen @ The Market have been seen as successful, marrying the skills and education of the workforce and creating employment opportunities. The City of Buffalo allocated eight hundred (800) square feet of space inside the historic Broadway Market to operate a commercial kitchen incubator. The objective of the Broadway Market's Commercial Kitchen is to position Buffalo as a center for local food entrepreneurship and food business. The Kitchen @ The Market is where new food entrepreneurs will be able to start their businesses, focusing on their product, without having to bear high overhead costs. Chefs can rent space and time in the kitchen to prepare large catering orders, bottle or can foods for retail, and more.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

The Innovation HUB enhances and better coordinates start-up support programs, networks, and access to mentoring and business expertise this existing programming, as well as develop new initiatives and supports to provide start-ups with guidance through all phases of development—from idea to growth. HUB acts as a coordinator—serving as the front door and concierge support to guide start-ups to the right assistance and services. The HUB also employs an Entrepreneurs-in-Residence program where paid experienced entrepreneurs serve as interim Chief Executive Officers to start-ups. The HUB also offers Subject Matter Experts who will help with regulatory, IP, and market development. There is an outreach program to enhance opportunities for women and minorities to start and grow technology businesses in Buffalo. A major component of the HUB will be to coordinate existing and offer new resources to engage local students in start-up activities. The HUB provides opportunities for coordinated co-curricular experiential learning with 43North and other technology and life science start-ups through new and existing activities such as 43North Week, Global Entrepreneurship Week, Maker Space, internships and fellowships.

The Western New York Workforce Training Center provides the skills, education and supports for all job seekers while meeting the needs of industry and acting as a catalyst to attract and retain businesses to the Northland Corridor and Buffalo Niagara region. The Western New York Workforce Training Center is a public/private, educational, training, and workforce development partnership to provide the skills, education and supports for job seekers while meeting the needs of industry and acting as a catalyst to attract and retain businesses in Buffalo

Niagara. The Center provides for-credit, certificate and degree programs as core offerings through its State University of New York educational partners in six high-demand and hardest to fill manufacturing skills areas, energy skills areas, and pre-manufacturing training.

Buffalo Manufacturing Works is a member-based, state-of-the-art facility in Northland that creates an ecosystem to help local manufacturers identify, test, and implement technologies to create a competitive advantage for their products, expand into new markets and boost productivity, and stimulate innovation and growth for the region's manufacturing sector.

Say Yes Buffalo is an education-based, economic revitalization initiative that will continue to strengthen the regional workforce and offer unprecedented educational opportunity for an entire generation of Buffalo Public School students. Established in 2012, Say Yes incentivizes graduation from the Buffalo Public Schools with a commitment to provide graduates with the tuition they need to attend a partner college and university and earn a degree or certificate. Say Yes also provides student support services that are critical to educational success. With volunteer mentors, local donors and internship providers, Say Yes is a landmark collaborative model. It is based on a successful national initiative that has helped to boost graduation rates and post-secondary attainment rates in cities across the nation.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes, The City of Buffalo is part of the Economic Development Corporation for Erie County. In 2016 the Comprehensive Economic Development Strategy (CEDS) was updated. The plan provides strategies, initiatives and "agenda" or actions for strengthening economic growth.

- Job Readiness—initiative aimed at improving the match between education and training and jobs in the region and strengthening the connections between P-12 system, higher education, and business.
- Smart Growth—initiative to reinvest in urban centers, neighborhoods, and rural villages to conserve energy and make great places, transform brownfields from liabilities into assets and reduce the cost structure of local government by following smart growth principles in infrastructure planning.
- Entrepreneurship—calls for a new ecosystem that will nurture innovation and risk taking by providing better access to venture capital, granting relief from regulations and offering a race of practical services to new businesses.

The criteria for selecting projects that will advance the regional strategy are:

1. Inclusive
2. Promotes Smart Growth
3. Oriented to Young Adults
4. Builds Upon Strengths
5. Regional Impact
6. Improves Region's Image

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The City of Buffalo will continue to fund the Business Loan Program to manage the portfolio of past economic development activities, along with several public service programs that provide vocational and workforce training.

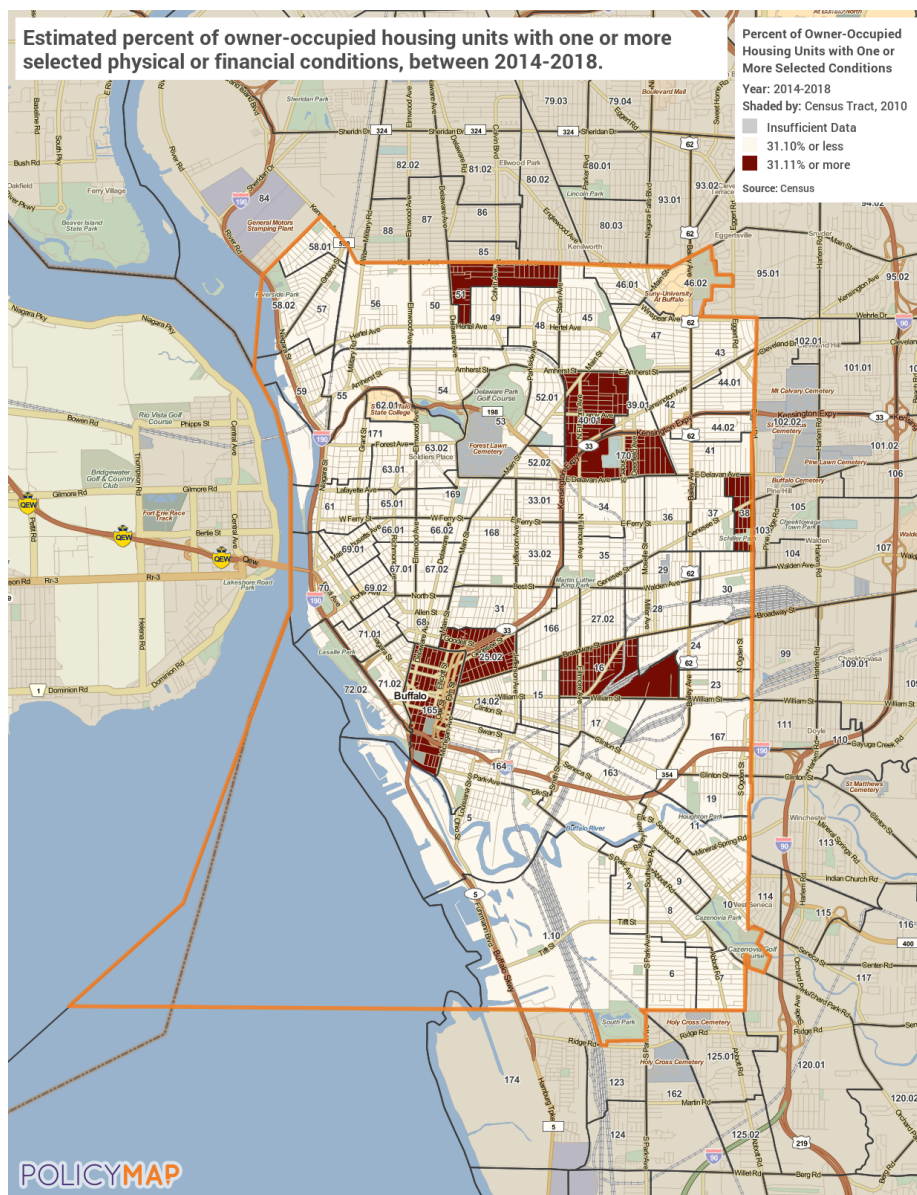
Discussion

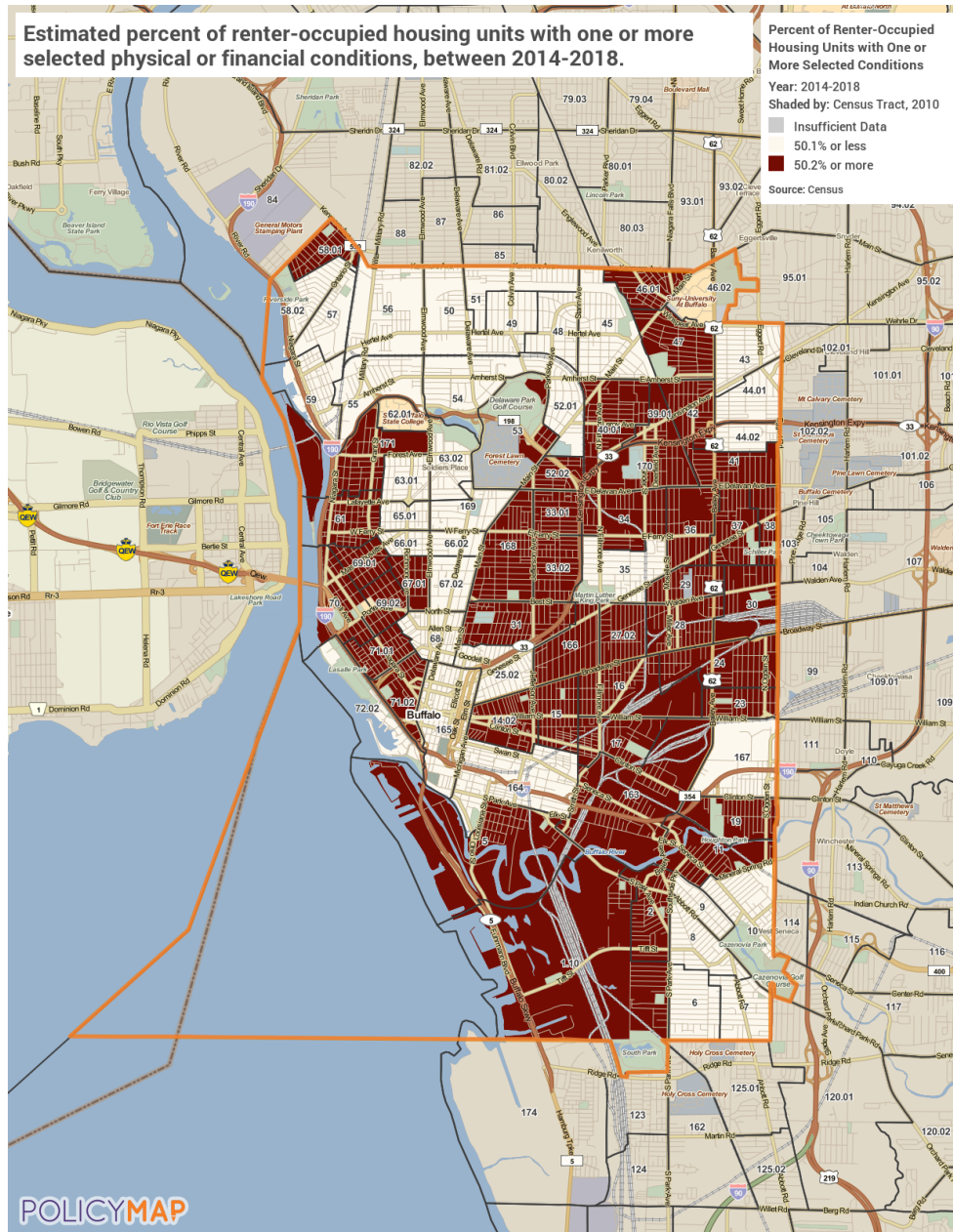
The City of Buffalo is dedicated to improving and growing the economy within the City. This will be accomplished through implementing strategic plan goals and programs dedicated to assisting low to moderate income households.

MA-50 NEEDS AND MARKET ANALYSIS DISCUSSION

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

To define areas of concentration with multiple housing problems, census tracts where the housing problems are ten percentage points higher than housing problems Citywide. According to CHAS data provided in the MA section of this plan 21.1% of owner households have at least one of more housing problems and 40.01% of renters have at least one or more housing problems. The maps below show census tracts with concentrations of housing problems for homeowners and renter households. These include census tracts 51, 40.01, 17, 38, 16, 25.02, , 58.01, 171, 61, 69.01, 69.02, 71.01, 5, 1.10, 2, 11, 19, 163, 17, 14.02, 15, 23, 24, 30, 28, 27.02, 166, 31, 168, 33.02, 29. 37, 38, 36, 34, 3.01, 52.02, 170, 41, 42, 47, 46.01.



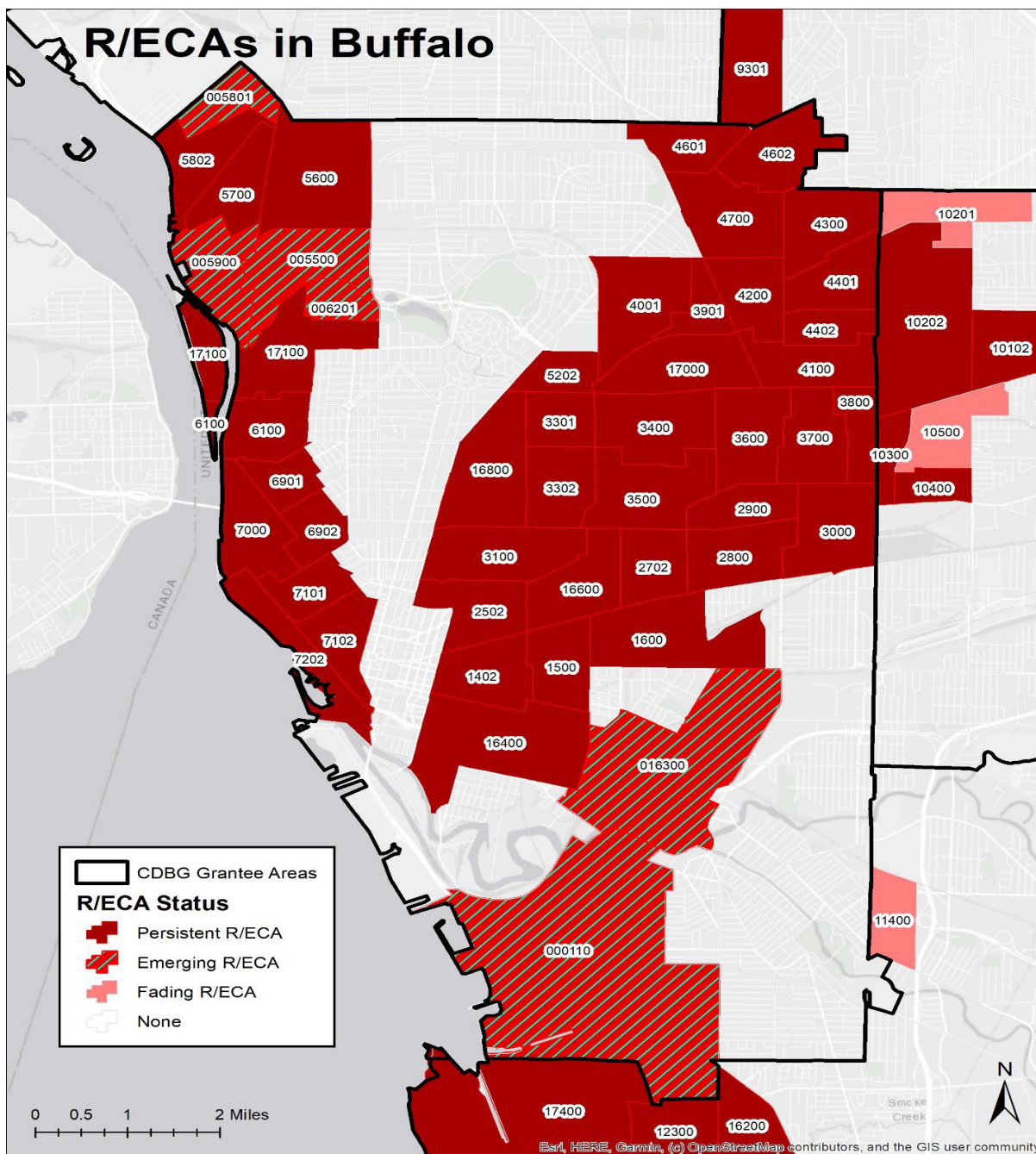


Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

In the most recent Analysis of Impediments to Fair Housing Choice, definition of areas of minority concentration are spaces where a minority group's fraction of population in that space is ten percentage points higher than the group's share of Citywide population. Moreover, to the extent that they constitute the three largest non-White racial and ethnic groups in Buffalo, this definition has been applied to the Black, Asian, and Hispanic populations separately in efforts to identify racially or ethnically concentrated areas (R/ECAs).

Buffalo contains numerous areas characterized by concentrated racial or ethnic populations. For the most part, the locations of those areas (census tracts) have remained relatively constant

over time and, as such, most are classified as “Persistent” per the terms set for above. However, five new tracts emerged as R/ECAs in the current Census ACS data (2013- 17) relative to the HUD-provided dataset, which relies on 2009-13 ACS data. Three of those five tracts are located in the Northwest section of the City, while the remaining two are in the south. Perhaps indicative of a continuing trend, four of the five Emerging R/ECAs are areas where the Hispanic/Latinx population is concentrated.



What are the characteristics of the market in these areas/neighborhoods?

Since much of the City is comprised of LMI areas, five communities were selected as examples. These areas were purposely distributed across the City to capture a representative sample. These neighborhoods have high poverty, unemployment, and vacancy rates; along with low- to moderate-incomes. In comparison to citywide demographics, however, many of these sampled areas were close to average, indicating the wide distribution of poverty.

Are there any community assets in these areas/neighborhoods?

Northwest: - The housing stock is primarily modest wood-frame homes from the late 1800s to mid-1900s. The commercial districts are largely underutilized and lack significant neighborhood retail options. The greatest asset is the neighborhood's proximity to the Niagara River, which is the site of Riverside Park.

East Side: - Located on the eastern border, this neighborhood has experienced significant blight and disinvestment. The housing is generally modest, dating from the late 1800s and early 1900s. There are areas of residential viability, but some streets contain large numbers of vacant buildings and lots. Commercial corridors offer few retail options. The western edge of the neighborhood is anchored by MLK Park, and numerous churches are invested in improving conditions.

West Side: This neighborhood is one of the poorest in the City, likely due to its role as an entry point for recent immigrants. These groups face many challenges, including difficulty in finding employment; yet bring a fresh vibrancy to the neighborhood. The residential portion has its share of vacancies and abandoned buildings, yet many structures are being renovated. The Grant Street commercial district is mostly intact and offers retail outlets including banks, grocers, and ethnic stores.

Northeast: This neighborhood offers an intact and stable housing stock. Most of the homes are modest wood-frame structures constructed in the first half of the 1900s, as streetcar lines were extended. The Bailey Avenue commercial strip has maintained a stable presence of retailers. The neighborhood is adjacent to the University at Buffalo's South Campus and includes a public elementary school and a charter school that are part of the Promise Neighborhood effort.

South Buffalo: This neighborhood is located on the City's southern border. Most of the housing is wood frame from the early 1900s, along with small ranches and bungalows added in the 1940s and 1950s. Commercial strips continue to offer neighborhood services, although there is a growing number of vacancies. Cazenovia Park anchors the eastern edge of the neighborhood, providing playing fields, an ice rink, and community center.

Are there other strategic opportunities in any of these areas?

CDBG-funded activities in Buffalo are targeted at block groups with at least 51% low / moderate income and in proximity to emerging employment centers that can provide opportunities for

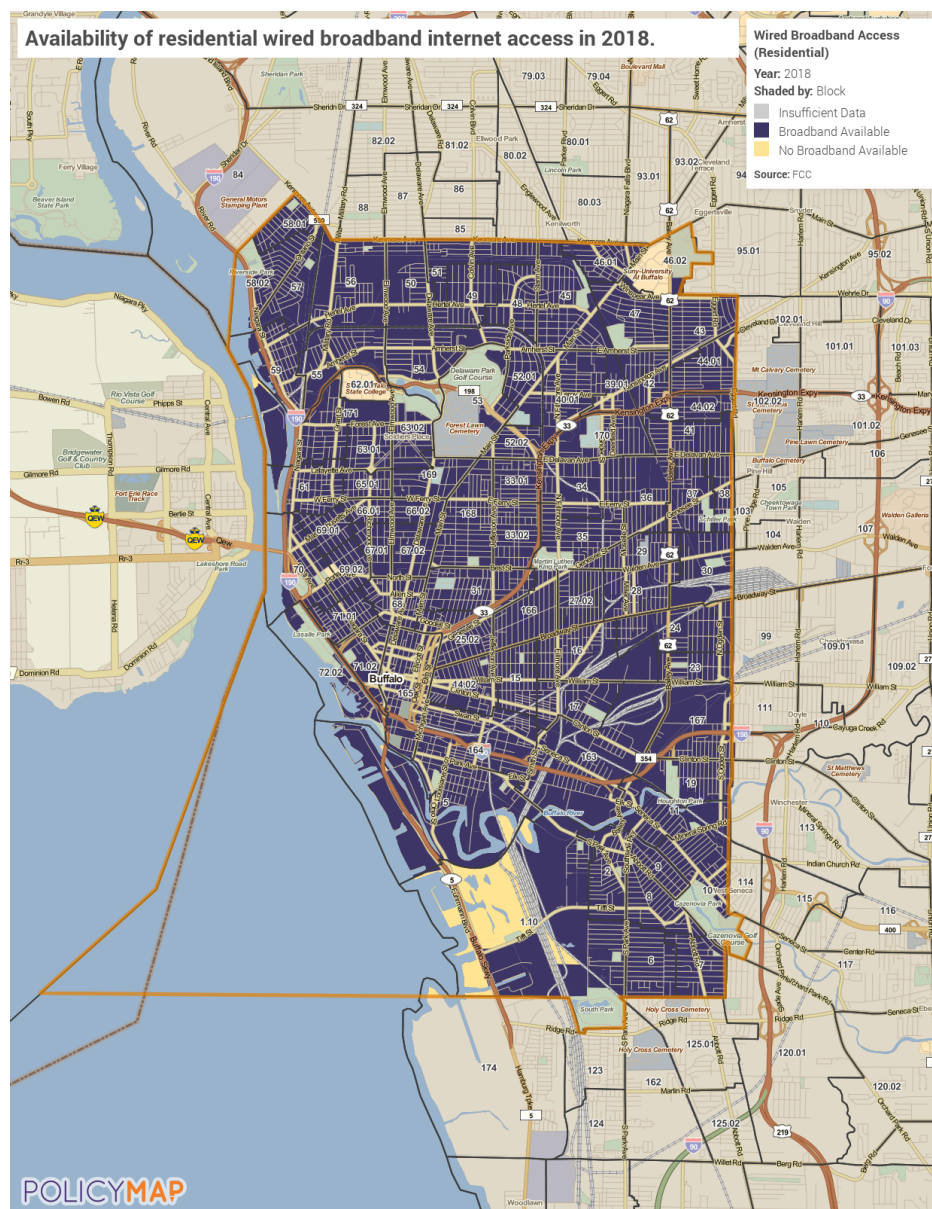
residents. Additionally, areas with community-based support with dedicated funded are focus for funded projects to expand opportunity and ensure residents have necessary support.

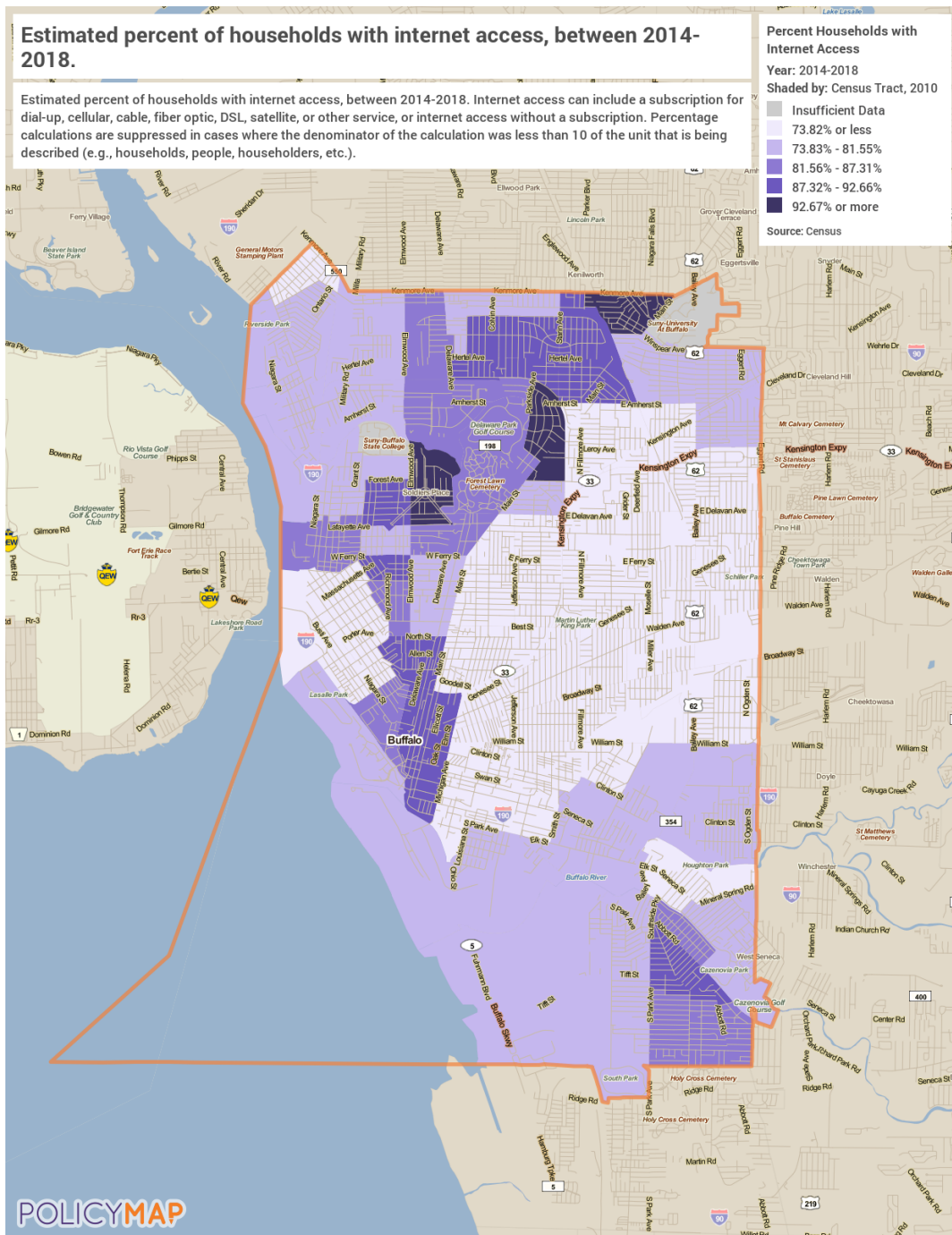
The RFP for HOME funding includes a requirement that new rental projects are located outside of areas of minority concentration and will not contribute to a significant increase in the proportion of minority residents in a neighborhood. However, many Census Tracts in Buffalo are R/ECAPS so waivers are frequently given to projects to allow them to be built in these neighborhoods.

MA-60 BROADBAND NEEDS OF HOUSING OCCUPIED BY LOW- AND MODERATE-INCOME HOUSEHOLDS - 91.210(A)(4), 91.310(A)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

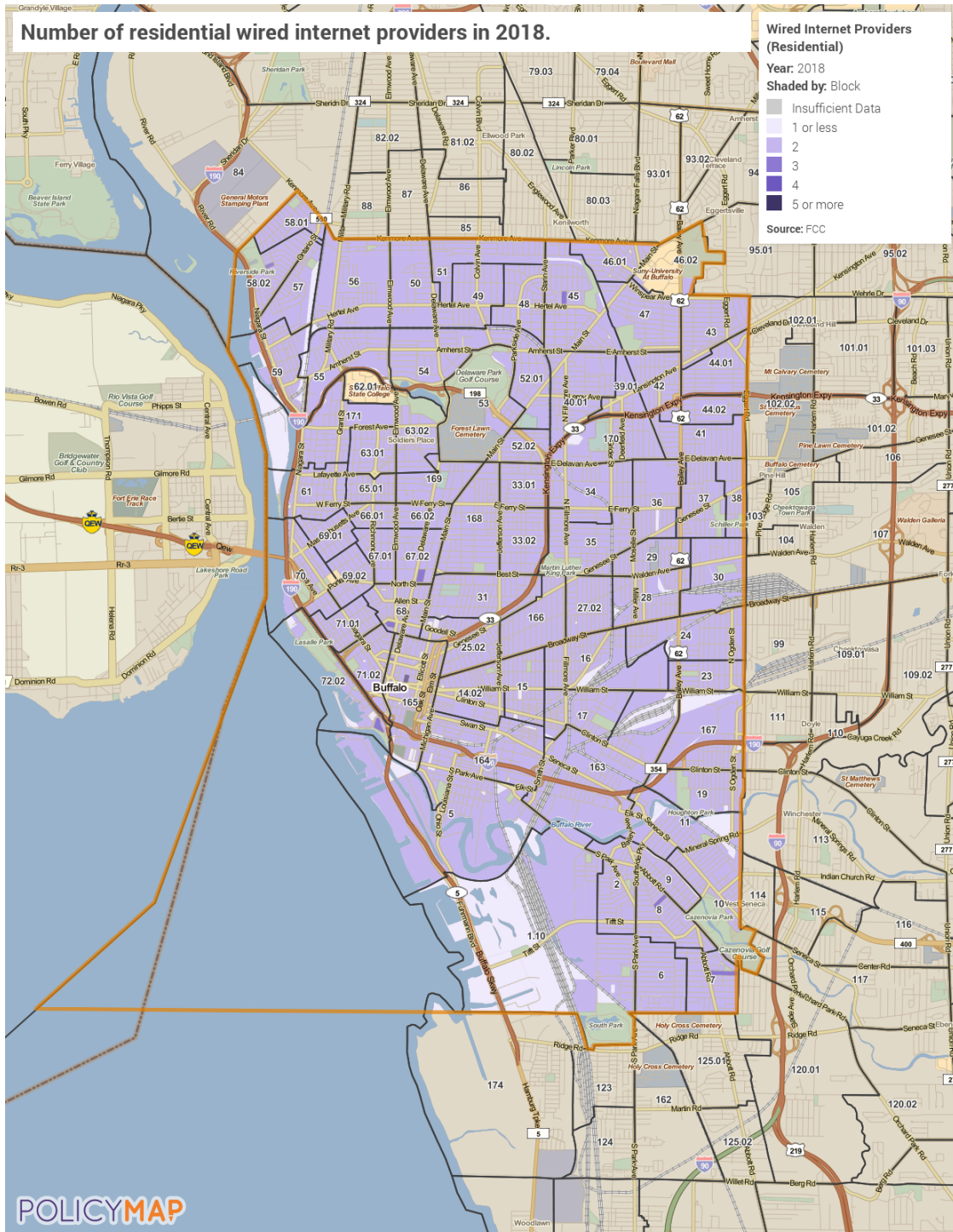
As shown on the following map generated by PolicyMap, the vast majority of the City of Buffalo has access to broadband service indicating that there is not a digital divide among lower- and higher- income neighborhoods. However based on the second map, there is a portion of the jurisdiction where a low percentage of households who have internet access. Stakeholders note this is due to the high costs for this service.





Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

As shown in the following map generated by PolicyMap, the vast majority of the City of Buffalo has more than one broadband internet service provider in their jurisdiction. A few limited area has a third option.



Describe the jurisdiction's increased natural hazard risks associated with climate change.

The December 2014 Climate Change Action Strategy Document *Resilient Buffalo Niagara Strategies to Respond to Climate Change*, written by Dr. Himanshu Grover provides a broad policy framework for responding to the existing and anticipated impacts of climatic change already underway across the Buffalo-Niagara region. Reductions in snowfall and increase in mean temperature and rainfall will have economic and agricultural development impacts on the City of Buffalo. Dr. Himanshu Grover notes "the Buffalo Niagara region is situated along two Great Lakes: Erie and Ontario. This geographical location creates unique climatic features that are highly sensitive to local and regional changes in weather and climate conditions."

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

The *Resilient Buffalo Niagara Strategies to Respond to Climate Change*, points out individuals with relatively lower income, education, and other similar in comparison to others in the community are likely to be more vulnerable. Dr. Himanshu Grover notes "the impacts of these changes will be further exacerbated by existing vulnerabilities and unsustainable development practices in local communities, such as urban expansion in low-lying areas, a lack of cohesive infrastructure management and redevelopment strategies, and income inequality, among other existing socio-economic challenges."

Research identifies the following groups to be more vulnerable in the City of Buffalo:

- **Low-Median Home Value:** Owners of such properties are unlikely to have enough resources to invest in weatherization or other upgrades that may be necessary due to changing weather conditions.
- **Racial Composition, specifically high percentage of the population that is African American:** African Americans are more vulnerable to its effects on health, housing, economic well-being, and culture in their own communities. They are also more vulnerable to higher energy bills, unemployment, and recessions caused by global energy price shocks.
- **High rates of unemployment:** Residents in these communities will also require additional support to help them adapt to changing climatic conditions
- **High rates of Poverty:** These communities are relatively more vulnerable, since they will require additional resources to ensure that their residents below the poverty line are not exposed to increased public health hazards and other impacts from climate change.

STRATEGIC PLAN

SP-05 OVERVIEW

Strategic Plan Overview

The purpose of the Strategic Plan is to guide the use of Community Development Block Grant (CDBG) HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) funds in the City of Buffalo over the next five years. The plan is guided by three overarching goals that are applied according to the City of Buffalo's needs. The goals are:

- To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and assisting homeless persons and families into permanent housing.
- To provide a suitable living environment through safer, more livable neighborhoods, greater integration of low- and moderate-income residents throughout the City, increased housing opportunities, and reinvestment in deteriorating neighborhoods.
- To expand economic opportunities through more jobs paying self-sufficient wages, homeownership opportunities, development activities that promote long-term community viability, and the empowerment of low- and moderate-income persons to achieve self-sufficiency.

Priority Needs:

The City has identified the following priority needs to be addressed over the next five years which will work to address the racial wealth gap and foster a community of fairness, equity, and justice:

- Increase Access To/Quality of Affordable Housing
- Provide Homeless Housing and Services
- Provide Special Needs Housing and Services
- Improve Public Facilities and Infrastructure
- Provide Public Services
- Eliminate Slum/Blighting Influences
- Economic Development
- Planning and Administration

SP-10 GEOGRAPHIC PRIORITIES – 91.215 (A)(1)

Geographic Area

Target Area Name:	Community Wide (New Castle County)
Target Area Type:	Local Target area
Other Target Area Description:	
Revital Type:	Comprehensive
Other Revital Description:	
Target Area Name:	CDBG Eligible Areas
Target Area Type:	Local Target area
Other Target Area Description:	
Revital Type:	Comprehensive
Other Revital Description:	

Table 48 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Federal CDBG funds are intended to provide low and moderate income (LMI) households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. The system for establishing the geographic priority for the selection of these projects in the City of Buffalo is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of LMI residents
- Affirmatively furthering fair housing
- Coordination and leveraging of resources
- Sustainability and/or long-term impact
- The ability to demonstrate measurable progress and success

Priority CDBG funding areas include areas where the percentage of LMI persons is 51% or higher.

SP-25 PRIORITY NEEDS - 91.215(A)(2)

Priority Needs

The following is a framework for priorities, needs and goals to address the City's identified needs during the next five years. The final determination on funded activities will occur during the review process for the prioritization of projects.

The priorities presented were developed by:

- Weighing the severity of the need among all groups and sub-groups
- Analyzing current social, housing, and economic conditions
- Analyzing the relative needs of low- and moderate-income families
- Assessing the resources likely to be available over the next five years, and
- Evaluating input from stakeholder sessions, interviews, service provider surveys, City department staff and public hearings.
- Considering City's goal to close the racial wealth gap and foster a community of fairness, equity, and justice.
- Evaluating the emerging needs presented by the COVID-19 pandemic

Priorities were established using the following definitions:

- **High** priorities are those activities that will be considered first for funding with CDBG, HOME, ESG and HOPWA resources.
- **Low** priorities are those activities that will be considered after high-priority projects if CDBG, HOME, ESG and HOPWA resources are available.

Low priority activities are still important and are not meant to be understood as being unnecessary in the City. The City has identified a limited number of priorities to provide a focus for activities that will be funded in the next five years. If additional funding becomes available, low priority activities will be considered.

For projects that address a high priority need, the City will base funding decisions on the capacity and past-performance of the sub-recipient, the type of project, the potential to leverage federal funds with other resources, the anticipated impact of the project and the reasonableness of the proposed budget and timeline for completion. Once projects that address high priorities are acted upon, the City will then review projects and activities to meet low priorities.

The City of Buffalo's priority needs were determined based on existing data on the needs of the community, as well as consultation with City staff, extensive stakeholder outreach workshops, public hearings, and citizen surveys. In addition, Buffalo Housing Strategy was used as a guide for identifying the following priority areas for the City over the next five years.

- Increase Access To/Quality of Affordable Housing
- Provide Homeless Housing and Services
- Provide Special Needs Housing and Services
- Improve Public Facilities and Infrastructure

- Provide Public Services
- Eliminate Slum/Blighting Influences
- Economic Development
- Planning and Administration

In light of the increasing severity of the COVID-19 pandemic, The City of Buffalo is interested in making available CDBG funding to program eligible projects and activities. As of June 10, 2020, Erie County has 6,659 confirmed cases, with Buffalo having the most in the County with 2,967 cases. While the level of severity in our community is changing daily, the number of confirmed cases is expected to rise as testing becomes more readily available. To assist in providing public facilities (new, expanded, retrofitted, etc.), special economic development assistance to businesses, public services and/or planning (in some limited cases) that could enhance our community's response to the impact of the pandemic, our community will place a high priority on providing facilities and services in support of a coordinated pandemic response.

1	Priority Need Name	Increase Access to/ Quality of Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Persons with Disabilities
	Associated Goals	Provide Homeowner Rehabilitation Assistance Provide Rental Rehabilitation Assistance Create New Affordable Rental Housing Increase Homeownership
	Description	There is a high level of demand and support for the creation of new affordable units within the City, as well as to preserve the City's existing, aging housing stock. Affordable rental units are in short supply in the City; coupled with the aged housing stock, improvements can be made to existing units or new units created to relieve cost burden faced by so many families in the City.
	Basis for Relative Priority	Providing quality affordable housing remains a high priority for the City and is a demonstrated need based on feedback received during stakeholder outreach, as well as the Needs Assessment and Market Analysis sections of this document. The City's goal is that 40% of the housing stock will be affordable either through a subsidy or market rate.

2	Priority Need Name	Homeless Housing and Services
	Priority Level	High
	Population	Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Associated Goals	Provide Homeless Services
	Description	Addressing homelessness through housing and services, including rapid rehousing, street outreach, shelter/transitional housing, homeless prevention, and supportive services.
	Basis for Relative Priority	Addressing the issue of homelessness continues to be a high priority for the City.
3	Priority Need Name	Affordable Housing for Special Needs Populations
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Associated Goals	Increase access to and quality of affordable housing Rehabilitate vacant and/or existing units into affordable rental housing Provide home rehabilitation assistance
	Description	Support initiatives to increase permanent affordable rental and housing ownership opportunities. This could include rental housing for people with disabilities and low incomes.

	Basis for Relative Priority	Increasing the number of affordable units continues to be a high priority for the City.
4	Priority Need Name	Eliminate Slum/Blighting Influences
	Priority Level	High
	Population	Non-Community Development
	Associated Goals	Code Enforcement Demolish Dilapidated Structures
	Description	In order to provide safe, livable communities for its residents, the City of Buffalo will use CDBG funds to acquire, demolish, and dispose of blighted properties that present safety hazards in various communities throughout the City. While most of the properties will be vacant and uninhabitable, as necessary, any occupants of the properties will be relocated.
	Basis for Relative Priority	Removing blighting influences was identified as a need and priority for the City of Buffalo.
4	Priority Need Name	Infrastructure Improvements
	Priority Level	High
	Population	Non-housing Community Development
	Associated Goals	Improve the City's Infrastructure
	Description	Infrastructure improvements, including street improvements, continue to be a high priority for the City.
	Basis for Relative Priority	Buffalo is an older City with ongoing infrastructure improvement needs.
5	Priority Need Name	Public Facility Improvements
	Priority Level	High
	Population	Non-Housing Community Development

	Associated Goals	Improve the City's public facilities.
	Description	There is a high level of support to replace antiquated infrastructure, public streets and sidewalks. In addition, many communities require upgrades to public facilities, including ADA improvements and the installation/rehabilitation of community amenities.
	Basis for Relative Priority	Maintaining and improving the aging infrastructure, including water, sewer, streets, sidewalks, and storm water, and making handicap accessibility improvements at curb intersections and other locations as needed continues to be a high priority. In addition, improvements to parks and recreation facilities will also continue to be a high priority.
6	Priority Need Name	Economic Development
	Priority Level	High
	Population	Non-Housing Community Development
	Associated Goals	Economic Development
	Description	The City of Buffalo will use CDBG dollars for activities that promote employment, self-sufficiency, education, job training, technical assistance, and economic empowerment of low- and moderate-income residents in the community.
	Basis for Relative Priority	Economic development activities that promote self-sufficiency are high priorities for the City of Buffalo.
7	Priority Need Name	Public Services
	Priority Level	High

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Single adults Elderly Public Housing Residents Special need populations; including DV, youth, persons with HIV/AIDS, mental illness, substance use disorders, veterans
	Associated Goals	Promote Public Service Activities
	Description	The City will continue to promote public service activities which support the healthy development of the City's at-risk youth, adults, and families. Services will be in line with social determinates of health.
	Basis for Relative Priority	The City supports public services which support the healthy development of the City's at-risk youth, adults, and families, including HIV/AIDs and other special populations, including the City's goal to close the racial wealth gap and foster a community of fairness, equity, and justice.
8	Priority Need Name	Planning/Administration
	Priority Level	High
	Population	Other
	Associated Goals	Planning/Administration
	Description	Administrative and planning costs to operate the CDBG, ESG, HOPWA and HOME Programs.
	Basis for Relative Priority	Continued need to properly administer and operate the CDBG, ESG, HOPWA and HOME Programs.
9	Priority Need Name	Provide facilities and services in support of the pandemic response.
	Priority Level	High

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Single adults Elderly Public Housing Residents Special need populations; including DV, youth, persons with HIV/AIDS, mental illness, substance use disorders, veterans
	Associated Goals	Provide facilities and services in support of the pandemic response.
	Description	Provide public facilities and supports to Buffalo residents impacted by the COVID-19 pandemic.
	Basis for Relative Priority	New need to provide facilities and services to the community as a response to pandemic.

Table 49 – Priority Needs Summary

Narrative (Optional)

SP-30 INFLUENCE OF MARKET CONDITIONS – 91.215 (B)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Extremely low income and very low-income households in need of temporary assistance to be housed or prevent homelessness. The data included in Section NA-10 Housing Needs Assessment indicate that cost burden, i.e., paying more than 30 percent of household income for housing costs, is the major housing problem facing renters in virtually all low and moderate-income categories and family types. However, the limited amount of resources available to the City to address its many needs precludes the City from providing tenant-based rental assistance to cost-burdened renters.
TBRA for Non-Homeless Special Needs	Extremely low income and very low-income households in need of temporary assistance to be housed or prevent homelessness. HOPWA funds are used to provide TBRA for persons with HIV/AIDS in the City of Buffalo.
New Unit Production	There is a substantial need for affordable housing in the City of Buffalo. The housing stock is older and there are few new developments in general and specifically that can meet the needs of low- and moderate-income households and households with a person with a disability. The City will continue to support efforts to increase the supply affordable housing units by both private sector and public sector entities. These will be in line with the City's Housing Opportunity Strategy. The City plans to continue using CDBG and HOME funds to rehabilitate units occupied by low and moderate-income owners. the City anticipates using HOME funds to help CHDOs and developers produce new owner-occupied units and newly renovated rental units for low and moderate-income persons during the next five years.
Rehabilitation	Owner-occupied rehabilitation assistance is an effective way to preserve the City's affordable housing inventory, particularly if the market value of the home is such that the cost and extent of rehabilitation does not exceed the value that can be achieved. The housing stock in the City is increasingly old and deteriorating/deteriorated. Rehabilitation efforts should also include the ability to make upgrades to the home to allow for aging in place as well as provide for lead/asbestos abatement. The City plans to continue using CDBG and HOME funds to rehabilitate units occupied by low and moderate-income owners.
Acquisition, including preservation	Structures for adaptive use and infill sites in convenient locations near transportation and services, support historic preservation; create housing for cost burdened extremely and very low-income households, households with special needs, homeless persons; and expand ownership opportunities for working households at or below 80% of AML.

Table 50 – Influence of Market Conditions

Introduction

In the past, the City of Buffalo has combined its federal entitlement allocations with funding from other public and private sector funding sources to address its priority needs. The City hopes to be able to do so during the period of this Consolidated Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services Homeless Prevention	\$14,042,558	\$1,039,583		\$15,082,141	\$56,170,232	Funds for housing and non-housing community development needs. Funds for services for special needs populations, economic development and homeless services. Funds for pandemic response.
HOME	public-federal	Acquisition Homebuyer assistance Homeowner Rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$3,342,830	\$120,000		\$3,462,830	\$13,371,320	Funds for housing development.
ESG	Public federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing Rental Assistance Services Transitional housing	\$1,204,344				\$4,817,376	Funds for homelessness activities. Funds used for pandemic response.

HOPWA	Public-federal	Acquisition; Rehabilitation New construction of housing units; Facility operations; Rental assistance; Short-term payments to prevent homelessness Services	\$819,189				\$3,276,756	Funds for HIV/AIDS activities
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Table 51 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City will continue to make funding decisions that maintain program income, partner with non-profit and private organizations that have ample funding resources and continue to solicit non-federal funding. In addition to the funding above, such funding may also include:

- McKinney-Vento funds under the HEARTH Act
- Low-Income Housing Tax Credits
- Brownfield Cleanup Tax Credits
- Housing Development Fund.
- Housing Trust Fund
- Office of Mental Health's (NYSOMH)
- Office of Alcohol and Substance Abuse Services
- Department of Health
- Department of Health AIDS Institute
- Federal Home Loan Bank of NY
- Department of Veteran Affairs
- State and Local Government Funds
- Private Donations
- Other Federal Funding
- Community Foundation of Greater Buffalo
- Erie Co. Dept of Social Services Employment Division
- Erie County Department of Social Services
- Section 811 Supportive Housing for Persons with Disabilities
- Health Foundation of Central and Western New York
- Private equity
- United Way

Due to the extent of poverty in its population, the City has received a waiver from matching requirements for the HOME grant. The City follows the ESG Matching Requirement outlined in 24 CFR 576.201. During the contracting process for ESG, each applicant must provide documentation indicating that matching funds have been obtained.

Although there are no match requirements for HOPWA all of the funded agencies have other resources, such as cash resources and in-kind contributions, which are used to supplement the HOPWA funds.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

In the past, publicly owned land has been provided at or below fair market value to encourage the construction of new housing for low- and moderate-income households, thereby reducing development costs and facilitating the development of affordable housing, one of the City's top priorities.

During the next five years, the City will use publicly owned land or property to help address the outlined priority needs.

Discussion

The City of Buffalo will utilize federal, state and local funds to meet the goals outlined in the Consolidated Plan.

SP-40 INSTITUTIONAL DELIVERY STRUCTURE – 91.215(K)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Buffalo	Government	Housing; non-housing and community development; homelessness and HOPWA	City Wide
Buffalo Municipal Housing Authority	Public Housing Authority	Public Housing, housing development, Housing Choice Vouchers	City Wide
Evergreen Health Services	Non-Profit	Service provider	City Wide
Harvest House	Non-Profit	Service provider	City Wide
Buffalo Urban Renewal Agency	Government	Program delivery and admin	City Wide
Homeless Alliance of Western New York	Non-profit	Service provider	Region

Table 52 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Developing an effective and efficient program delivery system has been a priority for the City. While this system has been improved over the past few years, the City continues to monitor, assess, and seek ways to enhance its performance. Solid relationships have been built among the public agencies and non-profits who work with the City to implement these programs; and partners are encouraged to share their thoughts on how the delivery system and programs could work better. The City continues to look for ways to improve the way that it contracts for and distributes entitlement funding.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy		X	X
Legal Assistance		X	X
Mortgage Assistance	X		X
Rental Assistance	X		X
Utilities Assistance	X		X

Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X	X	
Other Street Outreach Services		X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X		
Education	X		
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
Other			

Table 53 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Persons with HIV/AIDS

There is currently a wide array of services directed towards the needs of persons living with HIV/AIDS. Since there is a longstanding approach to HIV/AIDS from a medical perspective, services for these clients become medically driven: case management, primary care, pharmacology, treatment, mental health. In addition, since there is a vast amount of specialized case management, there are complex and abundant homeless services tied to medical services for those living with HIV/AIDS.

The exception is in the area of education and employment training. Often, those living with HIV/AIDS seek assistance when their condition has reached a high level of disability. Naturally, there is usually not much urgency for education or employment training at this point of crisis. Additionally, HIV/AIDS services are currently more medically oriented, and the HIV/AIDS diagnosis is the leading diagnosis for most services, rather than identifying and addressing long standing causal issues.

Homeless Population

One of the primary Continuum of Care (CoC) goals is to ensure that homeless persons are linked to mainstream resources rather than create another service system to provide what should be community-based services specifically for the homeless. In order for persons to successfully exit the homeless system they have to have access to stable housing and that most often means the need for a stable source of income. It is therefore crucial that case management services are available to assist homeless persons in navigating public benefit systems such as Social Service and Social Security. The CoC funded programs in the community are very successful at making these linkages.

The Homeless Alliance of Western New York, the CoC serving the City of Buffalo has ensured homeless services are in line with the federal strategic plan to end homelessness. As the needs of the homeless population change, the CoC strives to adapt and meet these changing needs.

There continues to be a need for additional affordable housing for the lowest income residents in the City of Buffalo. According to the Homeless Alliance of Western New York, there is a need for Single Occupant Residences (SROs) to meet the needs of persons experiencing homelessness.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The services provided by organizations assisting persons experiencing homelessness have a history of coordinated effort, which is demonstrated by the Coordinated Entry system development and implementation. These organizations identified a need to continue to strengthen relationships among partners and provide more frequent and strategic services coordination. As part of the CoC's strategic plan, they have identified the need to continue to collaborate with housing developers to create affordable housing for people exiting the homeless system, expand partnerships and collaborations with local workforce to increase access to employment and earned income by people who are homeless or at risk and improve emergency shelter diversion efforts.

Persons with HIV/AIDS

There is currently a wide array of services directed towards the needs of persons living with HIV/AIDS. Since there is a longstanding approach to HIV/AIDS from a medical perspective, services for these clients become medically driven: case management, primary care, pharmacology, treatment, mental health. In addition, since there is a vast amount of specialized case management there are complex and abundant homeless services tied to medical services for those living with HIV/AIDS.

The exception is in the area of education and employment training. Often, those living with HIV/AIDS seek assistance when their condition has reached a high level of disability. Naturally, there is usually not much urgency for education or employment training at this point of crisis. Additionally, HIV/AIDS services are currently more medically oriented, and the HIV/AIDS diagnosis is the leading diagnosis for most services, rather than identifying and addressing long standing causal issues.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The City of Buffalo relies on an extensive network of public sector, private sector and non-profit organizations to implement its strategic plan. Over the next five years, the City expects to overcome gaps in the institutional structure and delivery system via the following:

1. Continued training and capacity building for non-profit organizations.
2. Enhanced monitoring to identify weak links in the system, to improve program performance and to ensure compliance with all applicable regulations.

3. Renewed efforts to encourage increased collaboration among human service providers to eliminate duplicative services and to better serve City residents, especially low/moderate income households and special needs populations.
4. Continued support for additional resources for human service providers to meet the supportive service needs of all residents.

SP-45 GOALS SUMMARY – 91.215(A)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Homeowner Rehabilitation Assistance	2020	2024	Affordable Housing	City-Wide	Increase Access To/Quality of Affordable Housing Provide Special Needs Housing and Services	CDBG HOME	Units Rehabbed
2	Provide Rental Rehabilitation Assistance	2020	2024	Affordable Housing	City-Wide	Increase Access To/Quality of Affordable Housing Provide Special Needs Housing and Services	CDBG HOME	Units Rehabbed
3	Create New Affordable Rental Housing	2020	2024	Affordable Housing	City-Wide	Increase Access To/Quality of Affordable Housing	HOME	Units Created
4	Increase Homeownership	2020	2020	Affordable Housing	City-Wide	Increase Access To/Quality of Affordable Housing	CDBG	Units Created Homeowners Assisted
5	Provide Homeless Housing and Services	2020	2024	Affordable Housing Homeless	City-Wide	Provide Homeless Housing and Services	ESG HOPWA	People Assisted Households Assisted
6	Improve Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development	City-Wide	Improve Public Facilities and Infrastructure	CDBG	People Assisted Units improved

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Provide Public Services	2020	2024	Non-Homeless Special Needs	City-Wide	Provide Public Services	CDBG HOPWA	People Assisted
8	Code Enforcement	2020	2024	Non-Housing Community Development	City-Wide	Eliminate Slum/Blighting Influences	CDBG	People Assisted
9	Demolish Dilapidated Structures	2020	2024	Non-Housing Community Development	City-Wide	Eliminate Slum/Blighting Influences	CDBG	Units Demolished
10	Economic Development	2020	2024	Non-Housing Community Development	City-Wide	Economic Development	CDBG	Business Assisted
11	Planning and Administration	2020	2024	Admin	City-Wide	Planning and Administration	CDBG HOME ESG HOPWA	Other
12	Provide facilities and services in support of the pandemic response.	2020	2024	Non-Homeless Special Needs	City-Wide	Provide facilities and services in support of the pandemic response.	CDBG-CV ESG-CV HOPWA-CV	People Assisted

Table 54 – Goals Summary

Goal Descriptions

1	Goal Name	Provide Homeowner Rehabilitation Assistance
	Goal Description	The City of Buffalo will provide financial assistance and emergency repair assistance to low- and moderate-income homeowners to rehabilitate their existing owner-occupied housing. This includes accessibility improvements for the physically disabled.
2	Goal Name	Provide Rental Rehabilitation Assistance
	Goal Description	The City of Buffalo will provide financial assistance to rental property owners to rehabilitate housing units to be available for lease to low- and moderate-income households.
3	Goal Name	Create New Affordable Rental Housing
	Goal Description	The City of Buffalo will provide resources to increase the supply of decent, safe, sanitary and accessible rental housing that is affordable to low- moderate-income households. This could be construction of new units or rehabilitation of existing vacant units/buildings into affordable rental units.
4	Goal Name	Increase Homeownership
	Goal Description	The City of Buffalo will provide resources to income-qualified first-time homebuyers by providing down payment and closing cost assistance, requiring housing counseling, and in some cases providing resources to rehabilitate the home to be acquired.
5	Goal Name	Provide Homeless Housing and Services
	Goal Description	The City of Buffalo will use ESG funds to address a number of homeless issues, including rapid rehousing, street outreach, homeless prevention, emergency shelter operations, shelter and assistance for victims of domestic violence, and rental and financial assistance for households that are literally homeless.
6	Goal Name	Improve Public Facilities and Infrastructure
	Goal Description	Public facility improvements in the City of Buffalo are important to supporting the quality of life by providing adequate space for the provision of services, holding of events that bring the community together, and addressing public safety concerns. In addition, ensuring the City of Buffalo's public facilities are free of architectural barriers continues to be a priority for ensuring access to the City's services and facilities by all residents. The City of Buffalo will continue to support its various community development needs through public facilities improvements. In addition, the City of Buffalo will continue to support its various community development needs through upgrades to existing recreation amenities and creation of new opportunities.
7	Goal Name	Provide Public Services
	Goal Description	The City of Buffalo will provide resources to support public services that improve social determinates of health in order to promote health and wellness.
8	Goal Name	Code Enforcement
	Goal Description	The City of Buffalo will provide resources to enforce the local building code and ordinances through targeted code enforcement efforts.
9	Goal Name	Demolish Dilapidated Structures
	Goal Description	The City of Buffalo will use CDBG funds for code enforcement demolition and acquisition/demolition/disposition in areas of the City prone to blighting influences.

10	Goal Name	Economic Development
	Goal Description	The City of Buffalo will use CDBG dollars for activities that promote employment, self-sufficiency, education, job training, technical assistance, and economic empowerment of low- and moderate-income residents in the community.
11	Goal Name	Planning and Administration
	Goal Description	Provide effective and efficient implementation of CDBG, HOME, ESG and HOPWA funding in accordance with federal regulations.
12	Goal Name	Provide facilities and services in support of the pandemic response
	Goal Description	Provide needed supportive services, economic development and/or facilities to respond to the pandemic in the City of Buffalo.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City of Buffalo estimates providing affordable housing to XX number of low-to moderate-income residents.

SP-50 PUBLIC HOUSING ACCESSIBILITY AND INVOLVEMENT – 91.215(C)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

N/A: The Buffalo Municipal Housing Authority (BMHA) are not currently required to increase the number of accessible units by a Section 504 Voluntary Compliance Agreement.

Activities to Increase Resident Involvements

BMHA's Resident Services Division whose mission is to engage, educate, and empower residents throughout the BMHA's communities by providing opportunities for professional advancement, self-sufficiency, and improved quality of life has helped increase resident involvement. This division serves as a bridge to inform residents about and connect them to initiatives pertaining to important aspects of their personal and social lives. These initiatives include personal development, economic stability, education, health, and fostering family and community life at BMHA developments.

As a conduit between BMHA and its residents, the Resident Service Division:

- Works to organize resident councils at each development, as well as a citywide council.
- Assists the Resident Advisory Board in its mission to review and comment on BMHA's Annual Plan.
- Educates and consults with the Resident Review Board regarding reviewing public housing applicants.
- Helps to establish and educate residents regarding disaster preparedness through a resident initiative, BMHA Citizen Corps.

The Executive Director and Assistant Executive Director worked closely with the tenant council of Kenfield/Langfield to educate the tenant council on the principles of organizing a resident management corporation to manage the Martha Mitchell Community Center. HUD approved and issued the Resident Management Corporation Designation in 2019.

Additionally, the Resident Advisory Board ("RAB") for the BMHA has been engaged to discuss and contribute comments relevant to the various RAD applications in progress for the various properties as mentioned above. The RAB will remain engaged and continue to participate throughout the entire process.

Is the public housing agency designated as troubled under 24 CFR part 902?

No.

Plan to remove the 'troubled' designation

N/A

SP-55 BARRIERS TO AFFORDABLE HOUSING – 91.215(H)

Barriers to Affordable Housing

The City of Buffalo understands equal and unimpeded access to residential housing is a fundamental civil right that enables members of protected classes, as defined in the federal Fair Housing Act, to pursue personal, educational, employment, or other goals. The City is committed to furthering the federal Fair Housing Act, State and Local fair housing ordinance.

The City of Buffalo recognizes there are several barriers relating to affordable housing in the City. The City has identified those obstacles and formulated some remedies to remove those barriers. According to the most recent Analysis of Impediments to Fair Housing (AI), which was conducted at a regional level identified a common theme in any housing discussion is Not In My Backyard (NIMBY) sentiment. Residents are often opposed to any proposed development they believe may change the character of their neighborhood and / or affect existing home values. This is especially true when discussing affordable housing. Another barrier is the location of housing which affects access to employment, services, retail, and other needs. When housing is not located near reliable transit, it creates barriers. Insufficient levels of public transit service disproportionately affect communities of color and foreign-born residents in all six Grantee communities.

Deteriorating homes, including the presence of mold and / or lead, is an issue, particularly in older homes. Landlords are often less than diligent in maintaining and updating homes, leaving low income renters to deal with these issues

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The AI outlined a Fair Housing Action Plan for the City of Buffalo specially. The City will use these goals and actions to work toward removing or ameliorating the barriers to affordable housing.

Goal: Address declining housing quality and lack of maintenance

Action: Strictly enforce rental registration and require landlords to attend fair housing training as part of registration requirements

Action: Provide aggressive code enforcement to address housing decline and unsafe conditions

Action: Provide education to tenants about their rights to safe and adequate housing

- Continue partnerships with housing advocates and organizations providing outreach and education
- Continue practice of Fair Housing Officer participating in seminars, conferences, and education programs

Action: Expand funding for home rehabilitation / blight removal efforts

Goal: Expand housing opportunities outside of R/ECAP neighborhoods

Action: Leverage Green Code to expand multi-family and other housing options that may provide affordable options

Action: Partner with developers to encourage inclusion of affordable units into new developments

Action: Leverage HOME and CDBG funding to provide additional affordable units outside of R/ECAPs

Action: Assist developers with Low Income Housing Tax Credit process to provide affordable units in new development

Action: Provide education and support to reduce NIMBY opposition to housing (especially affordable unit) development

Action: Support efforts to reduce barriers to affordable housing development in neighboring jurisdictions and across Erie County

Goal: Improve services for Limited English Proficiency populations

Action: Review and revise Language Access Plan to ensure it is adequate for growing immigrant and refugee populations

Action: Partner with service organizations and others to ensure access to these communities

Action: Utilize foreign language papers, radio, and other media to ensure information is disseminated appropriately

Goal: Expand access to affordable, accessible units

Action: Consider implementing residency preferences for persons with disabilities

Action: Consider expanding percentage of accessible and "visitable" units required in new multi-family development

Action: Provide education to developers about need for accessible housing and design standards that can be incorporated into development

Goal: Ensure realtors, banks, mortgage companies, and others are not discriminating against protected classes

Action: Continue to provide fair housing education and training to real estate professionals

Action: Work with local lenders to expand access to funding for protected classes

Action: Continue / expand use of HOME and CDBG funding to provide down payment assistance for first-time and low-income homebuyers

Goal: Support services for the homeless population

Action: Review and expand funding support for homeless service providers

Action: Support the development of additional transitional and supportive housing where appropriate

Action: Work with regional partners to support expanded services in communities around Erie County to reduce concentration of poverty and homelessness in Buffalo

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

Engagement has proven to be fundamental to initial success of addressing the needs of the homeless community. Through engagement, homeless providers establish a relationship where an individual can feel safe, understood, and cared for. This could range from a simple gesture of providing a clean pair of socks to consistently maintaining contact over a period of time to build rapport and trust.

Since implementing Coordinated Entry (CE) during the 2016-2017 program year, the model has been successful in identifying homeless individuals whether meeting in person, connecting through street outreach, or via telephone. The VI-SPDATs and SPOAs are important tools for assessment and triage of the homeless which also gauges their vulnerability and specific needs. This allows outreach workers to not only employ a housing-first approach, but also linkage to other supportive services intended to treat the individual holistically.

For both street homeless and those in shelter, the process for determining need and continued services is the same:

1. If someone is homeless, a VI-SPDAT is completed by a program Case Manager or outreach worker
2. If someone is homeless or at risk for being homeless and have axis 1 mental health diagnosis, then a SPOA can be completed. These individuals are placed on a priority pool list and it is further explained that nothing is guaranteed from this point on. Individuals are also supported in other requested services besides just homeless services, (i.e.) MICA Services, Substance abuse, Family support, Care coordination, Emergency shelter are offered and available to everyone.

The ESG funded two Street Outreach programs specifically tasked with identifying unsheltered individuals and engaging them through a low demand, friendly and supportive manner. Homeless individuals tend to frequent hot spots where others tend to gather whether it be in an abandoned building, under a bridge, etc. Outreach staff consistently make rounds in these areas where they can meet individuals and fulfill basic needs for someone like a pair of gloves for the winter, or transportation to a drop-in shelter during cold weather. Trust begins to form and clients often open up about their income, mental health, substance use, transportation or other problems.

In addition to Street Outreach, Harbor House Resource Center acts as hub for CE which includes a satellite office located at the Buffalo & Erie County Public Library. These two places are familiar to and frequented by street homeless over long periods of time. Unsheltered and sheltered individuals can meet, face-to-face with a Resource Navigator who is readily available for consultation, linkage, and emotional support.

Addressing the emergency and transitional housing needs of homeless persons

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

During 2018-2019, the City of Buffalo funded a network of Homeless service providers who work diligently in addressing the emergency shelter, transitional and permanent housing needs of homeless individuals. Shelter funding was provided to seven shelters, and includes ones specifically catered to families, women and children, youth. One transitional shelter was funded and reserved for young women. Each shelter offers case management services and works to get everyone placed on lists for housing using CE assessment tools and previously entered data found in HMIS.

Code Blue Collaborative: The Code Blue Collaborative ensures low-barrier shelter operations are open whenever the temperature or wind chill drop below 32 and 15 degrees. Two Code Blue 32-degree shelters are located at Holy Cross Church (345 7th Street) and Restoration Society, Inc. at Harbor House (241 Genesee Street). A day warming shelter is also available at Harbor House. Three sites are open for Code Blue when temperatures dip below 15 degrees: Holy Cross Church, Harbor House, and St. Luke's Mission of Mercy (321 Walden Ave). Every site provides linkage, engagement, and access to individuals who may be normally hard to reach. Once assessed using the VI-SPDAT, homeless clients are either referred to placement in Permanent Supportive Housing (PSH) or entered into Rapid Rehousing list and ranked based on vulnerability.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

During the most recent program year, the City of Buffalo funded two rapid rehousing efforts: one aimed at adults and families and one which specifically targeted young adults ages 17-24. The City also continued contracts with Housing Opportunities Made Equal (HOME) which is designed to assist in housing search, inspections, lead visual and assessments when warranted, rent reasonableness and fair market rent requirements. This helps to reduce the length of stay for individuals in shelters or other inhabitable conditions and maintains a smooth RRH process.

Foster Care

The discharge plan for foster care is being implemented successfully with the Erie County Continuum of Care. Foster care case managers at the Erie County Department of Social Services (ECDSS) create and carry out individual plans for each youth leaving the foster care system, which includes a housing plan. This discharge plan is based on state legislation which requires any child leaving foster care to be placed into appropriate housing, which includes apartments, small boarding homes, and housing with friends or family; but not a shelter, single room occupancy, or congregant living with more than 10 individuals.

Health Care

The discharge plan for health care systems is being implemented successfully with the Erie County Continuum of Care. According to the state Patient's Bill of Rights, hospitals are required to provide all patients with written discharge plans, which patients have to agree to prior to being discharged. Discharge planners provide assistance in linking those persons who require placement into inpatient and residential settings, such as nursing homes, rehab facilities, alcohol and substance abuse, and mental health treatment. These practices are effective for ensuring proper placement of individuals into permanent housing and treatment or care facilities.

Mental Health

State Office of Mental Health governs the release of patients from state mental health facilities. These regulations mandate that discharge plans include the provision of housing consistent with the level of care required by the patient and ensure that patients are not approved for release until they have a comprehensive discharge plan in place. The Erie County Department of Mental Health implements these regulations through a Single Point of Access system for available beds and Transitional Case Managers. Individuals are identified while in the facility and referred to Transitional Case Managers or through the SPOA Coordinator. The case manager is then responsible for coordinating housing, income, health, and behavioral health services upon discharge with the assistance of the psychiatric facility discharge planner.

Corrections

Approximately 45 to 60 days prior to an inmate's release, the State Division of Parole initiates the discharge planning process from state correctional facilities. Housing, specialized treatment needs, and employment are the highest priority goals addressed in the discharge planning process. The Division of Juvenile Justice and Opportunities for Youth has established a policy preventing the release of youth from its facilities into homeless shelters. Despite this process, there are a high percentage of former inmates who become homeless shortly after discharge from correctional facilities.

SP-65 LEAD BASED PAINT HAZARDS – 91.215(I)

Actions to address LBP hazards and increase access to housing without LBP hazards

The City of Buffalo continues its commitment to integrate lead hazard control policy into all of the revitalization projects. Buffalo Urban Renewal Agency (BURA) requires compliance with 24 CFR by all participating parties, unless exemptions apply. Procedures for notification, assessment, and interim control of lead-based paint hazards and clearance are followed. Conditions to be addressed are identified in the risk assessment completed for each property, and work items relating to these conditions are listed in the specification and bid package. Conditions relating to occupant protection, relocation, and worksite preparation are also included in the specification boilerplate to ensure that regulatory standards are met.

Lead Risk Assessments are ordered, and a Lead Clearance is achieved for all HOME funded rental housing developments, CHDO/ homebuyer projects, and owner-occupied rehab loan program properties. For the HOME funded owner-occupied rehab loan program, interim controls are used to stabilize deteriorated paint as identified in the lead risk assessment.

Both ESG grantees and HOPWA sponsors must comply with the Lead Based Paint guidelines when administering tenant based rental assistance to homeless families, and to eligible clients living with HIV/AIDS. In general, all units leased by clients in either the ESG or HOPWA program must be inspected prior to the tenant move-in date, using Housing Quality Standards. For all units built prior to 1978, Landlords are required to disclose the presence of or potential of lead in the unit by providing potential tenants with a copy of HUD's Lead Disclosure form, and the "Protect Your Family from Lead in the Home" pamphlet. When a child under the age of six is living in the unit, a Lead Based Paint Visual Assessment is required. All HOPWA and ESG Housing staff are required to participate in HUD's LBP Visual Assessment training in order for them to properly inspect the unit. The lead requirements apply regardless of whether a household is remaining in an existing unit or moving to a new unit. The visual assessment must be completed prior to assistance being provided, and annually thereafter. Grantees and Sponsors are responsible for ensuring that property owners and managers meet the lead-based paint requirements. When a unit is found to have lead in the home, the unit must either be abated using lead safe work practices prior to move in date, or another unit must be found.

Grantees and Sponsor staff are required to maintain a copy of the HQS and LBP assessment in the clients ACES file during monitoring, the LBP requirements are reviewed on a client by client basis.

BURA continues to remain a partner in the Buffalo Green and Healthy Homes Initiative (GHHI). Partner agencies, including the BURA funded Housing Organizations, participate in the GHHI Production Collaborative. The working group meets to facilitate cross referrals among the GHHI partners, identify funding resources to address the needs of the individual homes and contribute to the overall unit production. Other partner agencies include Belmont Housing Resources, the Erie County Department of Health, PrimeTime Energy Services, New York State Weatherization Organizations and the New York State Office of the Attorney General.

The City is also an active member of the Coalition for a Lead-Free Community, which is a consortium that meets and discusses ways public and private partners can work to highlight issues associated with lead hazards and child lead poisoning prevention programs. Lead Hazard Control Program: All property managers active in the city will be required to be lead-safe certified. The city's environmental testing firm will do lead testing upon referral from city building inspectors.

How are the actions listed above related to the extent of lead poisoning and hazards?

LBP hazards are very extensive across Buffalo. Roughly 70 percent of Buffalo's housing stock was constructed before 1980 meaning that most housing units in Buffalo have the potential for LBP hazards. Considering the enormity of the issue, the City of Buffalo, even with its partners, does not have the current resources to address all LBP hazards in the City. Yet, efforts are being made to address the most affected areas. Since 2016, City of Buffalo and Erie County governments have undertaken aggressive action to tackle the complex issue of lead hazards through policy change and increased resources. Their collaborative efforts have increased enforcement, education and funding and have supported shared data and aligned decision making.

Philanthropy, led by the Community Foundation for Greater Buffalo, has increased funding and advocacy efforts and convened partners across the region. This community has demonstrated a readiness for addressing lead head-on.

The ECHD's Lead Primary Prevention Program is concentrated in nine of the county's zip codes, predominately in the City of Buffalo: 14201, 14207, 14208, 14209, 14210, 14211, 14212, 14213, and 14215.

How are the actions listed above integrated into housing policies and procedures?

As mentioned above, the City has recently passed legislation to allow LBP hazards to be cited as a violation, and coordination efforts are made between the City and the County to cite housing and health code violations simultaneously. The City has also mandated that all of its rehabilitated units are lead-based safe and provides funding to CHDOs and community development corporations for lead-hazard remediation and toxic soil removal.

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Data from the 2017 ACS indicates that, 27.7% of all adults aged 18-64 live below the poverty line. Among the entire population, 30.9% live below the poverty line. Buffalo's anti-poverty strategy includes the provision of economic development activities and incentives, employment training, education, literacy and youth programs, lead abatement programs, and affordable housing programs. By developing a comprehensive strategy to eliminate poverty, the City will work towards helping its residents escape poverty while also delivering programs to prevent residents from falling into the poverty cycle.

In 2017 the Buffalo Niagara Strategic Plan for Prosperity was released as part of the Buffalo Billion. As part of this plan Buffalo Niagara seeks to prepare an appropriately skilled workforce to meet labor needs while addressing the barriers to economic self-sufficiency for the region's unemployed and underemployed populations. Both public and private sector leaders in the region believe that targeted, employer-driven training, improving skills certifications and industry job ladders for new and existing workers; and reducing geographic and socio-economic isolation from jobs are strategies needed to build a strong workforce and address the looming retirement cliff, especially in industries like manufacturing.

A new workforce development fund with a rolling application process will be created to ensure the pipeline for workforce is keeping up with industry demands. The fund is designed to promote and invest in innovative approaches to workforce training for underserved populations. The fund will help scale up organizations doing high-impact, results-oriented workforce training with strong results in training, job placement and retention. The fund will facilitate partnerships with community and neighborhood-based organizations with proven track records, trust and outstanding abilities for outreach and recruitment. It will also support target sectors ripe for growth in jobs and career ladder opportunities for entry-level and mid-skill workers, while funding best practice models that maximize collaboration between industry, employers and workforce trainers. In February 2022 the Mayor announced a new approach to economic development and job creations "Buffalo's Race for Place" which will foster dynamic public-private partnerships to foster the next wave of growth.

Say Yes Buffalo is an education-based, economic revitalization initiative that will continue to strengthen the regional workforce and offer unprecedented educational opportunity for an entire generation of Buffalo Public School students. Established in 2012, Say Yes incentivizes graduation from the Buffalo Public Schools with a commitment to provide graduates with the tuition they need to attend a partner college and university and earn a degree or certificate. Say Yes also provides student support services that are critical to educational success. With volunteer mentors, local donors and internship providers, Say Yes is a landmark collaborative model. It is based on a successful national initiative that has helped to boost graduation rates and post-secondary attainment rates in cities across the nation. The City has developed educational and employment programs for youth, adults, and special needs populations using

federal, state and local dollars. The City strives to continue in these efforts over the next five years.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?

The City of Buffalo has little or no control over many of the factors that cause poverty. Ultimately, federal, and state policies on welfare, health care, and the minimum wage are crucial factors in the fight to address and reduce poverty. However, the City will continue to combat poverty by providing incentives to attract, retain, and expand businesses; to advocate for improved employment-affordable housing-public transportation links; to support organizations and programs that provide job training, education, and placement services; to support youth and adult literacy programs; and to preserve, increase, and improve affordable housing options as part of its strategy to prevent and alleviate poverty in Buffalo.

The City of Buffalo committed funding over the next five years to close the racial wealth gap and foster a community of fairness, equity, and justice. This approach will align economic development, housing and public services to address the needs of Buffalo residents.

SP-80 MONITORING – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Community Based Organization (CBO) Monitoring

Six community-based organizations participate in the City of Buffalo Urban Renewal Agency's Community Partnerships Initiative (CPI). Monitoring of these groups is accomplished by offering technical assistance, training, reviewing monthly reports and conducting contract reviews.

Technical Assistance/Training

Training sessions are held by OSP during the contract period to review current policies/procedures, program forms, work plan activities and the contract schedule. These sessions are mandatory for all new CBO employees assigned to the CPI contract work plan. Ongoing technical assistance, on-site visits and training opportunities are available throughout the contract year to help enhance the administrative and management capacities of the groups. Additionally, the housing organizations are notified of various training/technical assistance opportunities offered by HUD.

Monthly Reports

The community-based organizations continue to be monitored through the review of the monthly reports. Uniform reporting forms are completed by the CBO and the agency must note any obstacles to performance and measures taken to overcome those obstacles. Payments are made to the groups based on a schedule of fixed fees and the submission of the invoice and activity tracker forms. The tracker form, at a glance, allows staff to determine if the groups are meeting or exceeding specific benchmarks listed in the work plans. The groups are contacted, via phone or electronic mail, if additional information is required to support the request or to provide an explanation of why benchmarks have not been met. A payment recap report is also updated and monitored each month to verify the timely expenditure of funds.

Mid Contract Site Visits & Desk Reviews

Site visits and desk reviews are conducted during the contract year to review the work-plan goals, the productivity of the agency, and the work plan schedule for the remainder of the agreement period. A report is drafted and provided to the agency and the CBO reports what actions have been taken to address any issues cited as part of the review. A desk review was provided to each of the six CBO partners during April 2019. Items cited in the reports include: timeliness of the submission of the program applications, the need to meet or exceed productivity goals and financial issues such as outstanding municipal obligations.

Monitoring Results/Improvements

- Financial Oversight/Audit Requirement – Each CBO is responsible to provide financial audits in a timely manner. If the required paperwork was not submitted to the financial monitor for review, management was required to communicate the timing requirements

to their independent auditors. If required paperwork was not submitted as requested, special conditions were assigned to the CPI contract.

- Productivity/Referrals – Each CBO was responsible to conduct enhanced outreach and marketing for all available programs. Each group continued to provide program information at neighborhoods events (Clean Sweeps, workshops, block club meetings, Community School events), conducting neighborhood walks/drives to identify problem properties, direct mailings, attendance at housing court, use of social media (website, Facebook and twitter postings), and meetings at off-site and/or satellite locations for application in-take.
- Training Sessions - CBO employees continue to participate in the training sessions offered by the City. A total of twelve meetings/training sessions were scheduled and held with the CBO staff. These meetings centered around the review and updates to the CBO/CPI contract. We discussed the need for timely performance is key in order to meet target submission program goals, receive the fee per service payments and spend down contract budgets.

Monitoring of the Revolving Loan Program

The City of Buffalo Urban Renewal Agency (BURA) has contracted with one Community Based Organization to administer a Revolving Loan Program. This program is funded from available program income generated from the principal and interest of the CBO's existing loan portfolio. These funds were used in combination with other available funds to provide health and safety repairs to low to moderate homeowners in the identified area. Staff from the City of Buffalo Urban Renewal Agency (BURA) conducted a monitoring review of the subject contract to ensure the CDBG funds are managed effectively and according to regulatory and contract requirements. An internal review of five selected files was conducted to determine if adequate source documentation was collected to support the calculation of the income eligibility to participate in the program. Additionally, a special emphasis was placed on offering guidance and technical assistance relating to the administration of the program.

Monitoring Results/Improvements

- Determination of Eligibility - It was advised that staff consider using the interaction income eligibility calculator located on the HUD website. Staff were encouraged to input the information, print out the results, and place the paperwork in the applicant's folder.
- Assemble a Formal Loan Review Committee. The committee should be responsible to meet and maintain meeting minutes, including recommending approval of loans, any CAPER 66 OMB Control No: 2506-0117 (exp. 06/30/2018) conflict of interest disclosures, changes to any loan terms, and approve any write-off or foreclosures, etc. It was recommended that the board minutes should be recorded and reflect a summary of all the actions taken by the loan review committee.
- Review Current Application Package - Review and update the application package to include recommended forms and disclosures.

HOME Multi-Family Rental Monitoring

Yearly Rent & Occupancy Report

It is the responsibility of the City to monitor the continuing compliance of all units that have received HOME funds in accordance with HUD regulations contained in 24 CFR part 92. Owners

of HOME-assisted multi-family rental projects are required to submit a Rental Housing Project Compliance Report (RHPCR) at the start of each calendar year to determine if occupancy/rent standards and other HOME requirements were met for the previous year.

A desk review is conducted to evaluate each annual report package and a preliminary worksheet, noting any potential problems or concerns, is completed for each project. The information noted on the worksheet is then recorded on the risk assessment worksheet which is used to determine and prioritize the order of the schedule of monitoring visits. A pre-monitoring letter is sent to each agency at least one month prior to the scheduled site visit. This letter confirms our appointment (date and time) and it includes a checklist of items that must be available at the time of the visit. Additionally, the owner is advised to have management and staff available to discuss files and any questions pertaining to the review of program or financial documents. The confirmation letter also allowed the property manager to provide ample notice, to each tenant, of the inspection process.

The site team conducts a review of 20% of the HOME assisted units or a minimum of five files to check for property standards and verify the accuracy of the information submitted as part of the annual compliance report. The team reviews and tests the files for: tenant selection, evidence of affirmative marketing, leases and project rules, tenant file maintenance, annual income certifications, rent limits, lead based paint, proof of paid city obligations (taxes, water/sewer) and audited financials. Additionally, a physical inspection of each property is conducted by a City of Buffalo Inspector. At the conclusion of the monitoring visit, the team discusses the preliminary results of the monitoring visit and provides an opportunity for the site owner and/or manager to report steps they may already have been taken to address areas of non-compliance or nonperformance.

A monitoring letter and written report are prepared and sent to the owner/management. If the property was noted as full compliance, then the file is closed. In other cases where the property is found to be out of compliance, a written response from the owner/manager is due to be submitted within 14 - 30 days of the date of the monitoring report. Once the corrective actions are completed and verified, the monitoring staff sends a clearance letter to the owner/manager stating that the findings and/or concerns are closed (monitoring file is then closed and filed). If the non-compliance is not corrected within the allocated period, management is contacted. If the owner/project management is still unable to demonstrate compliance, corrective actions such as meeting with the site manager and offering additional technical assistance (such as written guidance) are provided by staff.

Frequency of Monitoring

Annual Compliance Report packages were sent to the owners/managers of thirty-eight (38) HOME-assisted multi-family rental projects. All owners/managers are required to submit a Rental Housing Project Compliance Report. The groups are also responsible to return a package outlining their financial record keeping.

A priority continues to be the detailed review of the audited financial statements provided by the project owner for each project. The review is being conducted by the financial monitor. The information reviewed and reported by the financial monitor will become part of the final report

provided to the owner. In addition to reviewing the audited financial statements, the financial auditor is also tasked with the duty of determining if the project is able to remain financially viable through the length of the Agreement. The financial monitor also reviews the project's policies and procedures related to internal controls, general accounting policies, and accuracy of the financial statements. Working closely with project managers, the financial monitor also identifies areas where technical assistance can be provided.

Emergency Shelter Grant (ESG) Monitoring

The City of Buffalo performs an annual or bi-annual on-site monitoring and frequent monitoring using the Homeless Management Information System for all ESG sub-recipients. City of Buffalo staff serve on the Continuum of Care Project Selection Committee, as well as other CoC/Homeless committees. This allows for a smooth, unfettered flow of information between all parties involved. The CoC Written Standards also apply to ESG Subrecipients, with the HMIS lead providing quarterly reports on progress to standards.

An assessment is conducted for each funded program, agency, or entity. Where risk analysis reveals a greater risk of non-compliance, or where regulatory requirements provide for established frequency of monitoring, program staff will schedule an on-site monitoring. Upon completion of the field work, a monitoring report is prepared which highlights non-compliance findings or areas of concern.

Housing Opportunities for People with AIDS (HOPWA) Monitoring

HOPWA Monitoring is accomplished through a detailed annual review of the program, including case files and anecdotal program information, and a detailed review of financial claims for reimbursement. All Subrecipients are required to file financial claims containing supporting documentation for all costs claimed. Prior to payment, these are reviewed to ensure that costs are relevant to program activities and reasonable, are included in the approved contract budget within contract limits. During this program year a total of 1 out of 1 agency were monitored. Of them, there were zero findings due to on-site guidance.

Finally, all Subrecipients are subject to annual reviews of audited financial statements and Single Audit reports. These audits are conducted by the Department of Administration, Finance, and Policy & Urban Affairs.

EXPECTED RESOURCES

AP-15 EXPECTED RESOURCES – 91.220(C)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services Homeless Prevention	\$14,042,558	\$1,039,583		\$15,082,141	\$56,170.232	Funds for housing and non-housing community development needs. Funds for services for special needs populations, economic development and homeless services. Funds for pandemic response.
HOME	public-federal	Acquisition Homebuyer assistance Homeowner Rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$3,342,830	\$120,000		\$3,462,830	\$13,371,320	Funds for housing development.
ESG	Public federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing Rental Assistance Services Transitional housing	\$1,204,344				\$4,817,376	Funds for homelessness activities. Funds used for pandemic response.

HOPWA	Public-federal	Acquisition; Rehabilitation New construction of housing units; Facility operations; Rental assistance; Short-term payments to prevent homelessness Services	\$819,189				\$3,276,756	Funds for HIV/AIDS activities
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Table 55 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG

Funding to community-based organizations for the delivery of housing programs leverages additional resources from state and private sources. The funding spend on clearance activities leverages additional money from the City's general fund and capital improvement budget. Agencies that receive funding for public services bring in additional funding from federal, state, county, foundations, and other private sources.

HOME

Proposals for funding to rehabilitate, construct, or convert structures for affordable housing will consider the amount of matching funds as a criterion for award.

ESG

These funds require a minimum one-to-one match on the part of the City award to subrecipients. The current match, coming from other federal, state, county, and private sources that have been secured by sub-recipients. Upon initial submission and review of all ESG applications, the matching source and amounts are acknowledged. For the 2019-2020 program year, ESG matched amounts will total at least \$1,160,583 overall between all awarded participants. The City of Buffalo is also employing a new tracking system with all agencies to ensure the Match requirement has been met and verified. This task will be a collaborative effort led by the City's Administration, Finance, Policy, and Urban Affairs department.

HOPWA

This program is exempt from matching requirements.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Whenever feasible, the City will consider the use of publicly owned land for the construction of affordable housing for low- and moderate-income households.

ANNUAL GOALS AND OBJECTIVES

AP-20 Annual Goals and Objectives Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Homeowner Rehabilitation Assistance	2020	2024	Affordable Housing	City-Wide	Increase Access To/Quality of Affordable Housing Provide Special Needs Housing and Services	CDBG: \$968,726 HOME: \$2,457,122	Housing Units:
2	Provide Rental Rehabilitation Assistance	2020	2024	Affordable Housing	City-Wide	Increase Access To/Quality of Affordable Housing Provide Special Needs Housing and Services	CDBG: \$1,418,726 HOME: \$501,425	Housing Units:
3	Increase Homeownership	2020	2020	Affordable Housing	City-Wide	Increase Access To/Quality of Affordable Housing	CDBG: \$550,000	Households Assisted:
4	Provide Homeless Housing and Services	2020	2024	Affordable Housing Homeless	City-Wide	Provide Homeless Housing and Services	ESG: \$1,175,656	6,724 persons assisted (shelter, prevention, street outreach) 70 households (rapid rehousing)
5	Improve Public Facilities and Infrastructure	2020	2024	Non-Housing Community Development	City-Wide	Improve Public Facilities and Infrastructure	CDBG: \$5,855,220	Persons Assisted: 5,150

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Provide Public Services	2020	2024	Non-Homeless Special Needs	City-Wide	Provide Public Services	CDBG: \$2,200,000 HOPWA: \$800,219	Persons Assisted: 18,000 people HIV/AIDS Housing Operations, Housing Assistance: 105 Households HIV/AIDS Housing Operations, Housing Placement: 45 Households Supportive Services: Other 150 Other
7	Demolish Dilapidated Structures	2020	2024	Non-Housing Community Development	City-Wide	Eliminate Slum/Blighting Influences	CDBG: \$545, 000	Buildings Demolished: 21 buildings
8	Economic Development	2020	2024	Non-Housing Community Development	City-Wide	Economic Development	CDBG: \$25,000	Business Assisted:
9	Planning and Administration	2020	2024	Admin	City-Wide	Planning and Administration	CDBG: \$3,008,512 HOME: \$352,283 HOPWA: \$15,000 ESG: \$14,344	Other

Table 56 – Goals Summary

Goal Descriptions

1	Goal Name	Provide Homeowner Rehabilitation Assistance
	Goal Description	The City of Buffalo will provide financial assistance and emergency repair assistance to low- and moderate-income homeowners to rehabilitate their existing owner-occupied housing. This includes accessibility improvements for the physically disabled.
2	Goal Name	Provide Rental Rehabilitation Assistance
	Goal Description	The City of Buffalo will provide financial assistance to rental property owners to rehabilitate housing units to be available for lease to low- and moderate-income households.
3	Goal Name	Create New Affordable Rental Housing
	Goal Description	The City of Buffalo will provide resources to increase the supply of decent, safe, sanitary and accessible rental housing that is affordable to low-moderate-income households. This could be construction of new units or rehabilitation of existing vacant units/buildings into affordable rental units.
4	Goal Name	Increase Homeownership
	Goal Description	The City of Buffalo will provide resources to income-qualified first-time homebuyers by providing down payment and closing cost assistance, requiring housing counseling, and in some cases providing resources to rehabilitate the home to be acquired.
5	Goal Name	Provide Homeless Housing and Services
	Goal Description	The City of Buffalo will use ESG funds to address a number of homeless issues, including rapid rehousing, street outreach, homeless prevention, emergency shelter operations, shelter and assistance for victims of domestic violence, and rental and financial assistance for households that are literally homeless.
6	Goal Name	Improve Public Facilities and Infrastructure
	Goal Description	Public facility improvements in the City of Buffalo are important to supporting the quality of life by providing adequate space for the provision of services, holding of events that bring the community together, and addressing public safety concerns. In addition, ensuring the City of Buffalo's public facilities are free of architectural barriers continues to be a priority for ensuring access to the City's services and facilities by all residents. The City of Buffalo will continue to support its various community development needs through public facilities improvements. In addition, the City of Buffalo will continue to support its various community development needs through upgrades to existing recreation amenities and creation of new opportunities.
7	Goal Name	Provide Public Services
	Goal Description	The City of Buffalo will provide resources to support public services that improve social determinates of health in order to promote health and wellness.
8	Goal Name	Code Enforcement
	Goal Description	The City of Buffalo will provide resources to enforce the local building code and ordinances through targeted code enforcement efforts.
9	Goal Name	Demolish Dilapidated Structures
	Goal Description	The City of Buffalo will use CDBG funds for code enforcement demolition and acquisition/demolition/disposition in areas of the City prone to blighting influences.

10	Goal Name	Economic Development
	Goal Description	The City of Buffalo will use CDBG dollars for activities that promote employment, self-sufficiency, education, job training, technical assistance, and economic empowerment of low- and moderate-income residents in the community.
11	Goal Name	Planning and Administration
	Goal Description	Provide effective and efficient implementation of CDBG, HOME, ESG and HOPWA funding in accordance with federal regulations.
12	Goal Name	Provide facilities and services in support of the pandemic response
	Goal Description	Provide needed supportive services, economic development and/or facilities to respond to the pandemic in the City of Buffalo.

PROJECTS

AP-35 PROJECTS – 91.220(D)

Introduction

The plan outlines projects under four entitlement grants: CDBG funds will be used for housing rehabilitation, clearance of abandoned properties, community center and park repairs and upgrades, street and sidewalk improvements, public services, economic development assistance, program delivery, and planning and administration; HOME funds will be used for substantial rehabilitation and new construction, CHDO activities, program delivery, and administration; ESG funds will be used for street outreach, emergency shelter and transitional housing, prevention, rapid rehousing, HMIS reporting, and administration; and HOPWA funds will be used for housing assistance, permanent housing placement, supportive services, and administration.

Projects

#	Project Name
1	Substantial Rehab/ New Construction (Rentals & Homeowner)
2	Substantial Acquisition/Rehabilitation/New Construction: CHDO's-HOME
3	Community Housing Development Organizations CHDOs Operating
4	Program Delivery: Community Based Organizations CBOs
5	Program Delivery: Belmont
6	Rehab Loan & Homeowner Exterior Improvement- Single Family
7	Rehab Loan & Homeowner Exterior Improvement- Multi Family
8	Clearance/Demolitions
9	Public Facilities-Community Facility Improvements
10	Public Facilities- Park/Pool Improvements
11	Public Infrastructure- Street/Sidewalk Improvements
12	Business Loan Program (NYBDC)
13	Emergency Solutions Grant—HESG20
14	HOME Program Administration
15	Planning and General Program Administration
16	HOPWA Administration _HOPWA 20
17	Health Services- HOPWA 20
18	Public Service Activities

Table 57 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The plan attempts to allocate funding across a range of projects, to ensure that community development efforts are comprehensive. These neighborhoods have diverse needs, and funding must be dedicated to many different types of projects to begin making a difference. Funding is also aligned with the City's goal to close the racial wealth gap and foster a community of fairness, equity, and justice.

CDBG funding is used for emergency home rehabilitation; homeownership counseling; park and recreational facility improvements; street resurfacing and sidewalk replacement; public facility repairs and upgrades; public services, and economic development assistance.

HOME funding is used for owner-occupied rehabilitation; acquisition, rehabilitation, and resale of housing; and multi-family rehabilitation and new construction, and CHOO support. ESG funding is used for street outreach, emergency shelter and transitional housing, rapid rehousing, and prevention. HOPWA funding is used for housing assistance, permanent housing placement, and support services.

AP-38 PROJECT SUMMARY

1	Project Name	Substantial Rehab/ New Construction (Rentals & Homeowner)
	Target Area	City Wide
	Goals Supported	Provide Homeowner Rehabilitation Assistance Provide Rental Rehabilitation Assistance Create New Affordable Rental Housing Increase Homeownership
	Needs Addressed	Increase Access To/Quality of Affordable Housing Provide Special Needs Housing and Services Provide Homeless Housing and Services
	Funding	HOME: \$2,565,122
	Description	HOME funding will be used to support new construction, or the substantial rehabilitation of owner-occupied and rental housing for low- and moderate-income individuals and families. HOME funding is also used to assist with the work of Community Housing Development Organizations (CHDOs). BURA administers the City HOME funds via a HUD-approved Subrecipient agreement. CHDOs receive a 15 percent, HUD required set aside, of the city, HOME allocation to acquire and rehabilitate housing to be sold to low and moderately low-income households, or to support the new construction of housing in targeted communities to be sold to low and moderately low-income households. This program also supports CHOO organizations to build multi-family rental housing. The City may also set aside up to five percent of the HOME allocation to cover CHOO operating cost. The Multi-Family Rehab/Construction program provides HOME funding for the rehabilitation of developer owned affordable rental units, identified problem properties, or for the construction of new rental units. Funding is also used to ensure the availability of decent, safe and affordable housing for extremely low, very low, and moderately low-income renters. The program may also be used for the new construction of single-family homes which will be sold to low to moderately low-income households. Program funds will be used for rehab expenses in targeted neighborhoods that bring assisted units into compliance with building codes, including interim controls, or abatement to alleviate lead-based paint hazards. The city distributes this funding through a Request for Proposal (RFP) process. The Owner-Occupied Rehab Program provides HOME funding for the substantial rehabilitation of existing one to four family units, to ensure the availability of decent, safe, and affordable housing for extremely low, very low, and moderately low-income households. Program funds will be used for rehab expenses in targeted neighborhoods, or as matching funds for other targeted programs, including interim controls to alleviate lead-based paint hazards. Belmont Housing Resources and six Community-Based Organizations (CBOs) assist with this program by providing loan originations, work write-ups, and property inspections.
	Target Date	09/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	21 of housing units
	Location Description	City Wide
	Planned Activities	Substantial rehab and new construction of rental and homeowner properties throughout the City of Buffalo
2	Project Name	Substantial Acquisition/Rehabilitation/New Construction: CHDO's-HOME
	Target Area	Citywide
	Goals Supported	Provide Homeowner Rehabilitation Assistance Provide Rental Rehabilitation Assistance Create New Affordable Rental Housing Increase Homeownership
	Needs Addressed	Increase Access To/Quality of Affordable Housing Provide Special Needs Housing and Services Provide Homeless Housing and Services
	Funding	HOME: \$501,425
	Description	The program will provide funds to increase the availability of quality affordable new and existing housing for low and moderate-income households. Housing units for sale or rent will be rehabbed or developed by qualified CHDO's. The CHDO program will provide funds to assist qualified organizations to develop new affordable homebuyer housing or to acquire and construct or rehab affordable rental housing.
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	21 of housing units
	Location Description	Citywide
	Planned Activities	Increase the availability of affordable new and existing housing for low to moderate income households.
3	Project Name	Community Housing Development Organizations (CHDOs) Operating
	Target Area	Citywide
	Goals Supported	Provide Homeowner Rehabilitation Assistance Provide Rental Rehabilitation Assistance Create New Affordable Rental Housing Increase Homeownership
	Needs Addressed	Increase Access To/Quality of Affordable Housing Provide Special Needs Housing and Services Provide Homeless Housing and Services

	Funding	CDBG: \$50,000
	Description	Program delivery costs. Funds will also support staffing and other eligible expenses at CHDO's that are working in targeted neighborhoods to facilitate the provision of housing rehab funding to qualifying households in the City of Buffalo.
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Other
	Location Description	Citywide
	Planned Activities	
4	Project Name	Program Delivery: Community Based Organizations (CBOs)
	Target Area	Citywide
	Goals Supported	Provide Homeowner Rehabilitation Assistance Provide Rental Rehabilitation Assistance Create New Affordable Rental Housing Increase Homeownership
	Needs Addressed	Increase Access To/Quality of Affordable Housing Provide Special Needs Housing and Services Provide Homeless Housing and Services
	Funding	CDBG: \$400,000
	Description	Program delivery costs. Funds will support the rehab of housing to ensure the availability of decent, safe and affordable housing of very low, low- and moderated-income households. Funds will also support staffing and other eligible expenses at CBO's that are working in targeted neighborhoods to facilitate the provision of housing rehab funding to qualifying households in the City of Buffalo.
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Other
	Location Description	Citywide

	Planned Activities	Funds will support the rehab of housing to ensure the availability of decent, safe and affordable housing of very low, low- and moderated-income households. Funds will also support staffing and other eligible expenses at CBO's that are working in targeted neighborhoods to facilitate the provision of housing rehab funding to qualifying households in the City of Buffalo.
5	Project Name	Program Delivery: Belmont
	Target Area	Citywide
	Goals Supported	Provide Homeowner Rehabilitation Assistance Provide Rental Rehabilitation Assistance Create New Affordable Rental Housing Increase Homeownership
	Needs Addressed	Increase Access To/Quality of Affordable Housing Provide Special Needs Housing and Services Provide Homeless Housing and Services
	Funding	CDBG: \$550,000
	Description	Program delivery costs. Assist with the housing program by providing loan originations, work write-ups, and property inspections.
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Other
	Location Description	City Wide
	Planned Activities	Support staffing and other eligible expenses for Belmont staff.
6	Project Name	Rehab Loan & Homeowner Exterior Improvement- Single Family
	Target Area	Citywide
	Goals Supported	Provide Homeowner Rehabilitation Assistance
	Needs Addressed	Increase Access To/Quality of Affordable Housing Provide Special Needs Housing and Services Provide Homeless Housing and Services
	Funding	CDBG: \$868,726

	Description	The program will provide funds for emergency repairs to ensure the availability of safe housing for low- and moderate-income households in single-family owner-occupied structures. Program funds will be used for emergency assistance for major deficiencies, including roof repair, furnace replacement, repairs to electrical and plumbing systems, and repair of broken water and sewer lines, including interim controls to alleviate lead-based paint hazards (as needed) for structures that are owner occupied. This project will also fund Homeowner (HO) exterior improvements in targeted areas around major investments and strategic locations.
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	65 housing units
	Location Description	City Wide
	Planned Activities	Home improvements
7	Project Name	Rehab Loan & Homeowner Exterior Improvements- Multi Family
	Target Area	Citywide
	Goals Supported	Provide Rental Rehabilitation Assistance
	Needs Addressed	Increase Access To/Quality of Affordable Housing Provide Special Needs Housing and Services Provide Homeless Housing and Services
	Funding	CDBG: \$868,726
	Description	The program will provide funds for emergency repairs to ensure the availability of safe housing for low- and moderate-income households in owner occupied structures with two, three, or four units. Program funds will be used for emergency assistance for major deficiencies, including roof repair, furnace replacement, repairs to electrical and plumbing systems, and repair of broken water and sewer lines, including interim controls to alleviate lead-based paint hazards (as needed) for structures that are owner occupied. In some cases, CDBG funds from this allocation may also be used for repairs to rental units in HOME assisted 2-4 family owner occupied structures. Funding will also be used for low-moderate income Homeowner Exterior Improvements around major investments and strategic locations.
	Target Date	09/31/2021

	Estimate the number and type of families that will benefit from the proposed activities	64 housing units
	Location Description	Citywide
	Planned Activities	Home Rehab
8	Project Name	Clearance/Demolition
	Target Area	Targeted LMI Areas
	Goals Supported	Demolish Dilapidated Structures
	Needs Addressed	Eliminate Slum/Blighting Influences
	Funding	CDBG: \$600,000
	Description	Clearance funding is used to demolish vacant and abandoned residential, commercial, and industrial properties that are within targeted neighborhoods. This supplements other funding, such as the city' capital budget and general fund. It is anticipated that during PY 2020, funding will be used for 20 residential demolitions, and 1 commercial structures.
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	21 buildings demolished
	Location Description	Citywide
	Planned Activities	Demolition and clearance
9	Project Name	Public Facilities-Community Facility Improvements
	Target Area	Targeted LMI Areas
	Goals Supported	Improve Public Facilities and Infrastructure
	Needs Addressed	Improve Public Facilities and Infrastructure
	Funding	CDBG: \$2,465,000

	Description	Many of the public services provided to youth and seniors take place at city-owned community centers. The city works from a list of repairs that is prepared and maintained by the Department of Public Works. The city has developed a plan that will allow repairs for various community centers to be addressed over six program years. Structural repairs such as roofs, walls, and foundations will be taken care of first; followed by plumbing, HVAC, and electrical; and finally, interior finishes and fixtures. This will allow the most serious building issues to be addressed before they become larger problems. The city will use CDBG funding to make repairs to five community centers located in eligible low- and moderate-income neighborhoods.
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	3,380 persons 4 facilities
	Location Description	George K. Arthur 2056 Genesee St 14211, JFK-114 Hickory St 14204, Dorothy Collier-118 E. Utica 14209; Other-TBD
	Planned Activities	Facility Improvements
10	Project Name	Public Facilities: Park/Pool Improvements
	Target Area	Targeted LMI Areas
	Goals Supported	Improve Public Facilities and Infrastructure
	Needs Addressed	Improve Public Facilities and Infrastructure
	Funding	CDBG: \$900,000
	Description	Various park improvements are planned at the following City parks: KENSINGTON POOL \$300,000; ASAREESE-MATTERS (ALLISON POOL) \$500,000. A&E \$100,000
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	1,770 persons 3 facilities
	Location Description	Allison Pool-50 Rees St. 14213, Kensington Pool-665 Kensington Ave.14215, and Prospect Park-600 Prospect Ave 14213
	Planned Activities	Improvement to public areas to help ensure the safe use of public health and recreation facilities
11	Project Name	Public Infrastructure: Street/Sidewalk Improvements

	Target Area	Targeted LMI Areas
	Goals Supported	Improve Public Facilities and Infrastructure
	Needs Addressed	Improve Public Facilities and Infrastructure
	Funding	CDBG: \$2,650,220
	Description	DPW provides BURA with an annual list of streets that require resurfacing. Based on HUD guidelines, BURA conducts a three-part review to determine eligibility. The first step is a check to ensure that each segment is located within a HUD-eligible neighborhood. The second step requires counting the individual parcels on both side of the street and confirming that at least 51% are currently in residential use. If a segment meets both criteria, it is HUD-eligible. The final step takes the estimated cost of resurfacing each segment and divides it by the number of residential parcels, to eliminate any segments that have an unusually high cost per unit. After conducting a new analysis in FY19 year to identify additional segments, new street segments were determined to be eligible for CDBG funding. By approving the full list of eligible street segments DPW has the flexibility to more strategically commit to street segments based upon other sources of funding and final bid amounts.
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	# persons
	Location Description	East, West, North, and South portions of the City
	Planned Activities	Street paving and sidewalk replacement improvements.
12	Project Name	Business Loan Program (NYBDC)
	Target Area	Citywide
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: \$25,000
	Description	Program Delivery to manage the portfolio of past economic development activities.
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	# of businesses assisted
	Location Description	Citywide

	Planned Activities	Program delivery for prior economic development activities under the Business Loan Program (NYBDC)
13	Project Name	Emergency Solutions Grant—HESG20
	Target Area	Citywide
	Goals Supported	Provide Homeless Housing and Services
	Needs Addressed	Provide Homeless Housing and Services
	Funding	ESG: \$1,204,344
	Description	ESG funding provides support for street outreach, emergency shelter, transitional housing, prevention, and rapid rehousing to assist the homeless and other special needs populations. Applications for ESG funding are reviewed and rated by the Continuum of Care Committee, which has been designated by HUD to coordinate homelessness efforts in the region. AAP Budget: \$1,190,000; \$241,000 Street Outreach; \$277,600 Shelter-includes Code Blue; Prevention \$181,677; Rapid Rehousing \$449,900; HMIS \$54,167.
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	6,724 persons assisted (shelter, prevention, street outreach) 70 households (rapid rehousing)
	Location Description	Citywide
	Planned Activities	Street outreach, emergency shelter, prevention, HMIS, Administration and rapid rehousing
14	Project Name	HOME Program Administration
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	HOME: \$352,283
	Description	Supports the administrative costs of the HOME program
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Other
	Location Description	Citywide
	Planned Activities	Program Administration

15	Project Name	Planning and General Program Administration
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Planning and Administration
	Funding	CDBG: \$3,008,512
	Description	General management, oversight, and coordination of the CDBG Program.
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Other
	Location Description	Citywide
	Planned Activities	General management, oversight, and coordination of the CDBG Program
16	Project Name	Program Delivery: BURA
	Target Area	Citywide
	Goals Supported	Provide Homeowner Rehabilitation Assistance Provide Rental Rehabilitation Assistance Create New Affordable Rental Housing Increase Homeownership
	Needs Addressed	Increase Access To/Quality of Affordable Housing Provide Special Needs Housing and Services Provide Homeless Housing and Services
	Funding	CDBG: \$450,000
	Description	Funds will support the rehab of housing to ensure the availability of decent, safe, and affordable housing of very low, low- and moderate-income households. Funds will also support staffing and other eligible expenses for the BURA staff that are working in targeted neighborhoods to facilitate the provision of housing rehab funding to qualifying households in the City of Buffalo.
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	Other
	Location Description	Citywide
	Planned Activities	Support staffing and other eligible expenses for BURA staff.
17	Project Name	Health Services- HOPWA 20

	Target Area	Citywide
	Goals Supported	Provide Public Services Provide Homeless Housing and Services
	Needs Addressed	Provide Public Services Provide Special Needs Housing and Services
	Funding	HOPWA: \$819,189
	Description	HOPWA funding is used to assist individuals and families who are either HIV-positive or living with AIDS. As the only HOPWA grantee in the region, HUD requires that the city support providers who offer services to all residents of Erie and Niagara Counties. The City will provide HOPWA funds to Evergreen Health Services for tenant-based rental assistance \$260,000 and facilities based housing subsidy assistance \$152,000, short term rent, mortgage and utilities \$40,000, permanent housing placement \$45,000, supportive services \$248,219, project sponsor admin \$55,000; A portion of admin will be given to the Homeless Alliance of WNY to manage the HUD-mandated Homeless Management Information System that collects data on program participants(HMIS).
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed activities	HIV/AIDS Housing Operations, Housing Assistance: 105 Households HIV/AIDS Housing Operations, Housing Placement: 45 Households Supportive Services: Other 150 Other
	location Description	Citywide
	Planned Activities	tenant-based rental assistance and facilities-based housing subsidy assistance, short term rent, mortgage and utilities, permanent housing placement, supportive services and admin
18	Project Name	Public Services
	Target Area	Citywide
	Goals Supported	Provide Public Services
	Needs Addressed	Provide Public Services Provide Special Needs Housing and Services
	Funding	CDBG: \$2,295,967
	Description	CDBG funds will be used to provide public service activities to low-to-moderate income individuals. Services will be provided by local non-profit providers and are within one or more of the following categories: Economic Stability, Education, Social and Community Context, Health and Health Care, and/or Neighborhood and Built Environment.
	Target Date	09/31/2021
	Estimate the number and type of families that will benefit from the proposed	18,000 persons

	activities	
	location	
	Description	Citywide
	Planned Activities	Public services within one or more of the following categories: Economic Stability, Education, Social and Community Context, Health and Health Care, and/or Neighborhood and Built Environment.

AP-50 GEOGRAPHIC DISTRIBUTION – 91.220(F)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The City will fund efforts located within HUD-eligible low- and moderate-income block groups.

Geographic Distribution

Target Area	Percentage of Funds
LMI Targeted Areas	25%
City Wide	75%

Table 58 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

In order to generate the greatest impacts from declining entitlement funds, the City will focus efforts on neighborhoods that exhibit the following characteristics:

- Are near emerging employment and economic development engines that can serve as a stabilizing influence;
- Have developed a cohesive network of community-based and institutional support; and
- Have secured and leveraged funding to support their efforts.

Targeting and leveraging entitlement funding represents the best opportunity to accomplish the City's community development goals. The geographic reach represents assistance throughout the entire City of Buffalo.

AFFORDABLE HOUSING

AP-55 AFFORDABLE HOUSING – 91.220(G)

Introduction

The City will provide affordable housing to the homeless, non-homeless, and special needs populations through rental assistance, the construction of new housing units, and the rehabilitation of existing units.

One Year Goals for the Number of Households to be Supported	
Homeless	6,724
Non-Homeless	18,000
Special-Needs	150
Total	24,874

Table 59 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	129
Acquisition of Existing Units	42
Total	171

Table 60 - One Year Goals for Affordable Housing by Support Type

AP-60 PUBLIC HOUSING – 91.220(H)

Introduction

The City of Buffalo provides public services under its public housing arm, the Buffalo Municipal Housing Authority (BMHA) as the public housing administrator and the Rental Assistance Corporation of Buffalo (RAC). Buffalo's Public Housing Entities are continuing their major initiatives to improve housing stock and the overall living environment of its clients, and in doing so, hopes to remove any remaining stigma associated with public housing. RAC does not own or manage any of the properties where participants reside.

Buffalo Municipal Housing Authority continues to make improvements in its various programs which directly impact the quality of life for its residents. A special emphasis will be placed on Family Self-Sufficiency Programs, Pilot Programs, and funding strategies in an attempt to provide additional opportunities to families and individuals. These efforts will focus on empowering residents to become part of the management process through apprenticeship style training in different aspects of property management and associated trades needed on the properties.

BMHA continues to strategically identify resources and target potential funding for affordable housing in a number of ways. One of the biggest challenges to housing authorities is the loss of Congressional Appropriations dedicated to operating hard units within the Authority that have become uninhabitable. One of the ways in which BMHA addresses these issues is by utilizing their not-for-profit instrumentality and development entity, Bridges Development, Inc. (Bridges) to access funding for which private developers and housing authorities are deemed ineligible.

Actions planned during the next year to address the needs to public housing

Outlined in the 2019 Annual Agency Plan, BMHA identified new demolition projects to complete and several conversions to Project-Based Assistance under RAD.

A.D.Price Courts has completed a revitalization plan, which was approved by the Board of Commissioners in 2016. A 9% Low Income Housing Tax Credit application was submitted. The plan calls for the demolition of 9 of 10 buildings.

Commodore Perry Homes will submit an application to the Special Application Center for the demolition of the site in order to prepare the development site as shovel ready. A total of 281 units would be demolished.

Lakeview on the Park and Lakeview Family Homes will undergo the Rental Assistance Demonstration PBRA Conversion.

Commodore Perry Homes has received a multi-phase RAD Commitment for Housing Assistance Payment (CHAP) for 172 units of the 414 units. The BMHA has successfully converted a 46 units through a Transfer of Assistance to the Frederick Douglass Phase I affordable housing development. The remaining 126 units will be converted to Project Based Voucher in the Perry

Choice Neighborhood. The unit composition and designation has not yet been determined. Efforts will be made to replace the same number of units and designation.

Shaffer Village Development– As part of a redevelopment effort, the BMHA will be applying to convert all of the units to Project Based Voucher (PVB) under the RAD program. The redevelopment will work to replace all of the current units with newly constructed units. The conversion will target Low Income Tax Credit, NYS Public Housing Preservation Funds and permanent debt through the issuance of tax-exempt bonds by NYS Housing Finance Agency. Efforts will be made to replace the same number of unit type and designation.

Lyndon B. Johnson – Conversion to Project Based Voucher through a renovation program which will leverage Low Income Tax Credit and NYS State Public Housing Preservation funds and permanent debt through the issuance of tax-exempt bonds by NYS Housing Finance Agency.

Buffalo Municipal Housing Authority will be converting Lakeview on the Park and Lakeview Family Homes to Project Based Rental Assistance. Lakeview on the Park has a total of 138 units and Lakeview Family Homes has a total of 134 units. There will be no change in the number of units per bedroom type as part of this conversion.

Actions planned during the next year to address the needs to public housing

Actions to encourage public housing residents to become more involved in management and participate in homeownership

It is the strong desire of BMHA that these ongoing conversations will result in a homeownership program where local financial institutions and community partners will be identified.

BMHA will continue engagement with Resident Advisory Board (RAB). Currently the BMHA consults with the RAB in areas of management, policy changes and implementations, capital improvements, safety and security, redevelopment, and resident engagement.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

n/a

AP-65 HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES – 91.220(I)

Introduction

The City of Buffalo will support street outreach, emergency shelter, prevention, and rapid rehousing to assist the homeless and other special needs populations.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Buffalo will continue to require all ESG Subrecipients enter data into the HMIS system and utilize the VI-SPDAT tools when assessing clients for housing vulnerability and determining needs.

Staff from the Matt Urban Outreach team, Salvation Army, and Friends of the Night People will support efforts to locate homeless persons in shelters, soup kitchens and on the street; and link them with appropriate services, case management, and housing assistance.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Erie County Department of Social Services, or 2-1-1 after hours is the first stop in the Continuum's Emergency and Transitional Shelter placement system. Once placed in shelter, individuals must report for D.S.S. for continued placement. Once in Shelter or Transitional Housing, Coordinated Entry works to identify vulnerable homeless individuals for entry into the Rapid Rehousing program. Based on their VI-SPDAT assessment score, families and individuals are referred, in order of vulnerability, to the Rapid Rehousing list and are called, by order of score, when an opening in the CoC wide Rapid Rehousing program is available.

The Continuum also maintains a Youth "by name" list, for Rapid Rehousing efforts for transition age youth, ages 18-24. While an individual is waiting for more permanent housing, case managers and shelter workers work with the individuals to secure shelter placements and transitional housing. The coordination with Erie County Department of Social Services and 2-1-1 assures that everyone who is eligible for shelter can find a safe emergency placement on any given night, and will eventually be linked to case management, assessments and the resources needed to maintain permanent housing.

Transitional and permanent housing options are made thru our variety of partners, who serve the homeless and support efforts to secure permanent housing for all. When an individual is found with high acuity on the vulnerability assessment, they are referred to the Matt Urban Outreach team, who finds a permanent supportive housing bed for that individual as soon as possible.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City of Buffalo continues to fund Rapid Rehousing programs, in an effort to reduce the length of time homeless families, individuals, and youth are homeless. The Rapid Rehousing efforts have proven success in reducing the length of shelter stay. Programs such as the HOME Rapid Rehousing Housing location program, Catholic Charities and Compass House identifies affordable units, maintains a list of affordable units, provides inspection of those units and Fair market rent evaluation for Rapid Rehousing clients. This allows Case Managers to focus on helping the families and individuals stabilize, get their non-housing needs met and increase resources when able.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Often persons living in poverty are the most susceptible to becoming homeless due to the financial vulnerability associated with poverty. The City will provide funding to legal services to help tenants avoid eviction from their current dwelling and will work with the ECDSS to help provide homeless diversion through the Rapid Rehousing program and provide funding to homeless prevention efforts.

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	72
Tenant-based rental assistance	55
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	28
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	155

AP-75 BARRIERS TO AFFORDABLE HOUSING – 91.220(J)

Introduction:

The City will act to address barriers to affordable housing by addressing declining housing quality and lack of maintenance, expand housing opportunities outside of R/ECAP neighborhoods, improving services for Limited English Proficiency populations, expanding access to affordable, accessible unity, ensuring realtors, banks, mortgage companies, and others are not discriminating against protected classes, support services for the homeless and implementing its Fair Housing Action Plan as outlined in the Analysis of Impediments study.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Goal: Address declining housing quality and lack of maintenance

Action: Strictly enforce rental registration and require landlords to attend fair housing training as part of registration requirements

Action: Provide aggressive code enforcement to address housing decline and unsafe conditions

Action: Provide education to tenants about their rights to safe and adequate housing

- Continue partnerships with housing advocates and organizations providing outreach and education
- Continue practice of Fair Housing Officer participating in seminars, conferences, and education programs

Action: Expand funding for home rehabilitation / blight removal efforts

Goal: Expand housing opportunities outside of R/ECAP neighborhoods

Action: Leverage Green Code to expand multi-family and other housing options that may provide affordable options

Action: Partner with developers to encourage inclusion of affordable units into new developments

Action: Leverage HOME and CDBG funding to provide additional affordable units outside of R/ECAPs

Action: Assist developers with Low Income Housing Tax Credit process to provide affordable units in new development

Action: Provide education and support to reduce NIMBY opposition to housing (especially

affordable unit) development

Action: Support efforts to reduce barriers to affordable housing development in neighboring jurisdictions and across Erie County

Goal: Improve services for Limited English Proficiency populations

Action: Review and revise Language Access Plan to ensure it is adequate for growing immigrant and refugee populations

Action: Partner with service organizations and others to ensure access to these communities

Action: Utilize foreign language papers, radio, and other media to ensure information is disseminated appropriately

Goal: Expand access to affordable, accessible units

Action: Consider implementing residency preferences for persons with disabilities

Action: Consider expanding percentage of accessible and "visitable" units required in new multi-family development

Action: Provide education to developers about need for accessible housing and design standards that can be incorporated into development

Goal: Ensure realtors, banks, mortgage companies, and others are not discriminating against protected classes

Action: Continue to provide fair housing education and training to real estate professionals

Action: Work with local lenders to expand access to funding for protected classes

Action: Continue / expand use of HOME and CDBG funding to provide down payment assistance for first-time and low-income homebuyers

Goal: Support services for the homeless population

Action: Review and expand funding support for homeless service providers

Action: Support the development of additional transitional and supportive housing where appropriate

Action: Work with regional partners to support expanded services in communities around Erie County to reduce concentration of poverty and homelessness in Buffalo

AP-85 OTHER ACTIONS – 91.220(K)

Introduction:

The City will take other actions to address obstacles to underserved needs, foster and maintain affordable housing, reduce lead-based paint hazards, reduce the number of poverty-level families, develop institutional structure, and enhance coordination among agencies

Actions planned to address obstacles to meeting underserved needs

Despite an increase in some areas of Entitlement funding, the greatest obstacle that the City faces remains the limited community development dollars available from federal, state, local, and private sources. The overwhelming needs in Buffalo make it impossible to address everything that City leaders would like to improve. In response, the City has taken two approaches. The first is to target investments geographically to areas that can best benefit from an infusion of public support. The second is to be proactive in leveraging dollars and combining funds from various sources in order to achieve project goals. Each of these approaches is rooted in the City's goal to close the racial wealth gap and foster a community of fairness, equity, and justice.

Actions planned to foster and maintain affordable housing

The City has embraced smart growth as an approach for focusing revitalization and redevelopment in its existing neighborhoods. This ongoing effort to reverse decades of urban abandonment and suburban sprawl depends upon key investments of CDBG, HOME, state, and local funds to restore livability, economic potential, and social cohesion in targeted neighborhoods.

Central to this strategy is the Green Code - an updated land use plan and zoning ordinance. The goal is to use land use planning to support affordable housing by encouraging the development of dense, walkable neighborhoods with access to goods, services, and public transportation. Zoning is also a critical element in the provision of affordable housing, by removing barriers such as minimum lot sizes and prohibitions against mixed-use development that unnecessarily add to costs.

The City's goal is that 40% of the housing stock will be affordable. This can be accomplished through market rate units or the use of Federal, State, and Local dollars to create/preserve affordable units.

Actions planned to reduce lead-based paint hazards

LBP hazards are very extensive across Buffalo. Roughly 70 percent of Buffalo's housing stock was constructed before 1980 meaning that most housing units in Buffalo have the potential for LBP hazards. Considering the enormity of the issue, the City of Buffalo, even with its partners, does not have the current resources to address all LBP hazards in the City. Yet, efforts are being made to address the most affected areas. Since 2016, City of Buffalo and Erie County governments have undertaken aggressive action to tackle the complex issue of lead hazards through policy

change and increased resources. Their collaborative efforts have increased enforcement, education and funding and have supported shared data and aligned decision making.

Philanthropy, led by the Community Foundation for Greater Buffalo, has increased funding and advocacy efforts and convened partners across the region. This community has demonstrated a readiness for addressing lead head-on.

The ECHD's Lead Primary Prevention Program is concentrated in nine of the county's zip codes, predominately in the City of Buffalo: 14201, 14207, 14208, 14209, 14210, 14211, 14212, 14213, and 14215.

In January, The City of Buffalo launched a pilot program to combat lead poisoning. Within the first year, the City of Buffalo hired three new employees who have a goal to inspect 1,500 properties the city and county which have determined to pose especially high risks to children — rental singles and doubles in poor neighborhoods. Two of the new employees are city inspectors and the third is a community outreach specialist, whose goal is to educate tenants and landlords on the hazards of lead exposure, how to spot lead hazards and who to call to properly remediate their properties.

Actions planned to reduce the number of poverty-level families

Federal, state, and regional policies on welfare, health care, housing choice, transportation, and the minimum wage are all critical components in reducing poverty. While the City has little control over these factors, it will continue to assist in this effort by providing incentives to retain, expand, and attract business; to advocate for affordable housing and public transportation; and to support organizations and programs that provide job training, literacy, and placement services.

Actions planned to develop institutional structure

The City is continuing to improve its program administration with the Buffalo Urban Renewal Agency. While this has required a tremendous amount of work in setting up systems, it also offers an opportunity to revisit past practices and continue making improvements moving forward. BURA staff will continue to assist the City in administering portions of the CDBG and all of the HOME entitlement programs; and the City established a relationship with the New York State Business Development Corporation to administer its CDBG loan portfolio. The City of Buffalo will continue to be the only administrator of the ESG and HOPWA grants.

Actions planned to enhance coordination between public and private housing and social service agencies

The City continues to fund Housing Organizations which also provide social services to residents. Given the on-going reductions in funding, consolidating overhead and management expenses in this manner appears to be a trend that will continue to grow. The City will also aggressively encourage public service agencies to work collaboratively in addressing the broader range of

needs that families looking for assistance may need to begin the journey out of poverty.

PROGRAM SPECIFIC REQUIREMENTS

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction:

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$1,039,583
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City uses no other form of investment beyond those identified in Section 92.205. Under 92.205, a participating jurisdiction may invest HOME funds as equity investments, interest-bearing loans or advances, non-interest-bearing loans or advances, interest subsidies consistent with the purposes of the HOME program, deferred payment loans, grants, or other forms of assistance that HUD determines to be consistent with the purposes of the program. Each participating jurisdiction has the right to establish the terms of assistance, subject to the requirements of this part. The City generally invests HOME funds as interest-bearing loans or advances, non-interest-bearing loans or advances, deferred payment loans, or conditional grants.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City utilizes the "Recapture" and "Resale" Options for the resale of homebuyer property during the affordability period. The Recapture Option is based on the level of primary lender financing that the homebuyer is able to obtain, or the need for closing cost assistance. The option will be used whenever a development subsidy has been provided to a developer, CHDO, or other qualified entity for the construction of affordable housing; and A homebuyer is unable to obtain sufficient financing through a private lender or other approved subsidy source for the full amount of the listed fair market purchase price. A direct subsidy will be provided as gap financing up to the limits described in the HOME Agreement with the project developer; or A homebuyer has obtained sufficient financing through a private lender or other approved subsidy source for the full amount of the listed fair market purchase price, but does not have sufficient resources to fund the closing costs associated with the purchase. A direct subsidy up to \$5,000 will be provided to finance reasonable and necessary costs, including but not limited to costs to process and settle the financing for purchase of the home, such as fees for origination, credit reports, title, record and filing fees, attorney's fees, and appraisal fees.

In the event that it is determined to be appropriate to use the Resale Option, the City will submit proposed resale terms consistent with the HOME regulations to the local HUD Office and seek authorization to proceed. The Recapture Option is used to collect all or a portion of the HOME subsidy in the event the recipient decides to sell the property within the affordability period, or to otherwise violate the affordability provisions of the owner's agreement. The homebuyer may sell the property to any willing buyer, but the sale of the property during the affordability period triggers the repayment of the direct HOME subsidy. In the event that the proceeds from the sale are less than the repayment amount due, the homebuyer must petition the City to accept partial repayment. If sufficient documentation is presented to verify that the net proceeds are insufficient to repay the HOME investment as required, the amount to be repaid will be reduced to an amount not to exceed net proceeds. All entities that receive HOME funding for the creation of affordable homebuyer housing - including developers, CHDOs, and Community Based Organizations - will use these recapture provisions to ensure the full subsidy amount is due and payable, in an amount not to exceed net proceeds.

If a purchaser receives funding under the HOME program for a direct subsidy to support the purchase a HOME-assisted property, the full amount of the direct subsidy assistance provided is due and payable if the property is sold during the period of affordability.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Not applicable. Only Recapture Option is used.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that

is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City will not use HOME funds to refinance existing debt secured by multifamily housing. The City will use the affordable homeownership limits provided by HUD effective June 1st, 2018. If requested by the developer, for the multi-family rental housing, the City will provide occupancy preferences for proposed projects for those groups identified within the Consolidated Plan as having priority needs (SP-25).

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. **Include written standards for providing ESG assistance (may include as attachment)**
The Homeless Alliance has worked to create coordinated assessment tools, policies, and procedures for clients to access services more efficiently. The written standards are attached in the unique appendix.
2. **If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.**
See attached coordinated entry policy and procedures.
3. **Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).**
All ESG program funding is distributed to non-profit organizations that provide services to the homeless. Organizations apply for ESG funding using an application that assembles information on the type of services performed, the target population, and the amount of funding requested. Applications are reviewed and rated by the Continuum of Care Review Committee, which also provides funding recommendations to the City. Upon initial submission and review of all ESG applications, the matching source and amounts are acknowledged.
4. **If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.**
The City uses the Homeless Alliance's Continuum of Care Review Committee to assess and rate applications for ESG funding. This committee includes a formerly homeless person. The Homeless Alliance is frequently consulted regarding program issues and decisions.
5. **Describe performance standards for evaluating ESG.**
The City uses the Homeless Alliance's Continuum of Care Review Committee to assess and rate applications for ESG funding. This committee includes a formerly homeless person. The Homeless Alliance is frequently consulted regarding program issues and

decisions.

The following preliminary performance standards were developed after consultation with the Homeless Alliance:

- Reduce the number of persons entering homeless shelters.
- Reduce the number of persons returning to homelessness.
- Access mainstream income resources.
- Return 65 percent of participants to permanent housing.
- Stably house 75 percent of participants for at least six months after exiting the program.
- Reduce the length of shelter stays to less than 20 days, or by 10 percent of the current length of stay.

Under the HOPWA program, the City annually distributes a request for funding applications to identify project sponsors. This request is distributed widely, and all community-based, faith-based and grassroots organizations are eligible respond.